

*Exhibit No.:*

*Issue(s):* *Call Center Update,  
Paperless Billing, Credit  
Card Fee Messaging*

*Witness:* *Charles Tyrone Thomason*

*Sponsoring Party:* *MoPSC Staff*

*Type of Exhibit:* *Direct / Rebuttal Testimony*

*Case No.:* *WR-2024-0320*

*Date Testimony Prepared:* *December 6, 2024*

**MISSOURI PUBLIC SERVICE COMMISSION**

**FINANCIAL AND BUSINESS ANALYSIS DIVISION**

**CUSTOMER EXPERIENCE DEPARTMENT**

**DIRECT / REBUTTAL TESTIMONY**

**OF**

**CHARLES TYRONE THOMASON**

**MISSOURI-AMERICAN WATER COMPANY**

**CASE NO. WR-2024-0320**

*Jefferson City, Missouri  
December 2024*

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CHARLES TYRONE THOMASON  
MISSOURI-AMERICAN WATER COMPANY  
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1 rate case, Case No. WR-2022-0303. Second, I will convey Staff's position regarding MAWC's  
2 Paperless Billing proposal, which was introduced on pages 45-49 of MAWC witness  
3 Jody L. Carlson's direct testimony in the present case. Finally, I will discuss an issue Staff has  
4 discovered regarding credit card fee messaging on MAWC's website.

5 Q. How will your testimony be structured?

6 A. After briefly discussing MAWC's call center metrics since November 2022,  
7 I will provide an overview of MAWC's current paperless billing program and promotion  
8 history, including discussion of the basis for the Paperless Billing proposal. I will then explain  
9 the Paperless Billing proposal in detail and address the proposal's interaction with Commission  
10 Rule 20 CSR 4240 13.015(1)(B). Lastly, I will address messaging on MAWC's website  
11 regarding credit card fees, and Staff's recommendation for providing further clarity to  
12 customers seeking to make an online payment.

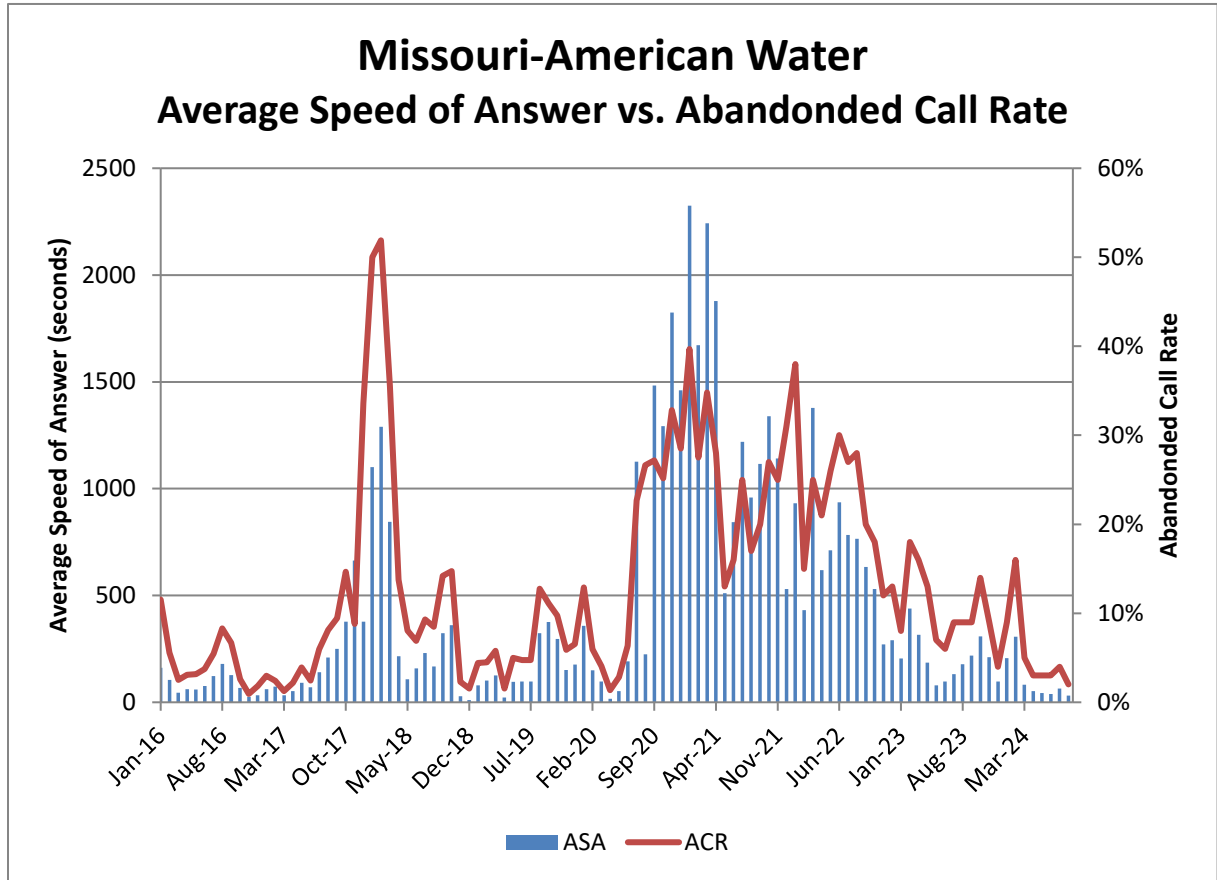
13 **CALL CENTER UPDATE**

14 Q. Could you provide a brief history of what occurred in Case No. WR-2022-0303  
15 regarding call center metrics?

16 A. Yes. In November 2022, I filed direct testimony in that case highlighting Staff's  
17 concerns with MAWC's call center metrics, specifically Average Speed of Answer ("ASA")  
18 and Abandoned Call Rate ("ACR"). Staff had observed that these metrics had been abnormally  
19 high since July 2020 and recommended that a third party conduct an operational audit of  
20 MAWC's call center to determine the root causes of the issues. In the Commission's Report  
21 and Order, it approved the details of the operational audit agreed to by the parties in the  
22 Stipulation and Agreement.

23 Q. Have MAWC's call center metrics improved since then?

1 A. Yes. Starting in November 2022, ASA and ACR levels decreased to levels not  
2 seen since 2020. Although there have been occasional spikes, 2023-2024 metrics have  
3 improved upon that progress. MAWC's current metrics are at levels more akin to  
4 pre-July 2020.



6  
7 Q. Was the audit performed in accordance with the Commission's Report  
8 and Order?

9 A. Mostly. The audit details approved by the Commission required the audit firm  
10 to provide two confidential status reports to MAWC, Staff, and the Office of Public Council  
11 ("OPC") during the course of the audit. To my knowledge, only one status report was provided  
12 in June 2024. Staff received no further information about the course of the audit until MAWC

1 filed the audit report in Case No. WR-2022-0303. This was filed on October 22, 2024, ahead  
2 of an October 23, 2024, meeting between the audit firm, MAWC, Staff, and OPC to discuss the  
3 audit results.

4 Q. What were the findings?

5 A. The audit submitted six recommendations of varying priority. The high priority  
6 recommendations were to \*\* [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 [REDACTED] \*\*. The medium priority recommendations were to \*\* [REDACTED]

11 [REDACTED]

12 [REDACTED] \*\*. The low priority recommendation was to \*\* [REDACTED]

13 [REDACTED]

14 [REDACTED] \*\*.

15 Q. Does MAWC plan to implement these recommendations?

16 A. According to MAWC, it is still evaluating the merits and cost-effectiveness of  
17 the proposed recommendations. At this time, it is unable to state whether or when it will adopt  
18 any of them.

19 **PAPERLESS BILLING**

20 Q. What is MAWC's proposal for its paperless billing program in the current  
21 rate case?

22 A. I will elaborate upon the specific details later in my testimony, but essentially  
23 MAWC's proposal is the automatic enrollment into paperless billing of all eligible customers

1 who do not opt out before a set deadline, and the notification process precipitating  
2 that conversion.

3 Q. Does MAWC currently offer paperless billing to its customers?

4 A. Yes. According to MAWC, it has offered a paperless billing option to its  
5 customers for over a decade. Customers have had the option of enrolling in paperless billing  
6 either online through their MyWater account or by calling MAWC's call center.<sup>1</sup> Customers  
7 enrolled in paperless billing, in lieu of receiving a paper bill, receive an email each month  
8 alerting them that their bill is available for viewing on MyWater. The email itself, although it  
9 informs the customer of the amount due and the due date, does not provide other elements of  
10 the bill such as a breakdown of the charges or the customer's usage amount. It does, however,  
11 include a link to the MyWater portal so that the customer can view their full bill in an electronic  
12 format. Customer can also log onto MyWater directly to view their bill.<sup>2</sup>

13 Q. What is MyWater?

14 A. MyWater is MAWC's online customer portal, through which customers who  
15 register are able to view their bills, make payments, view water usage history, check their  
16 balance, manage their account, and schedule some service orders as self-service.<sup>3</sup> Customers  
17 are not required to sign up for MyWater to establish service with MAWC, but those who do so  
18 are required to provide a valid email address.<sup>4</sup>

19 Q. How many MAWC customers are enrolled in paperless billing?

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<sup>1</sup> MAWC Response to Staff Data Request No. 0071.

<sup>2</sup> MAWC Response to Staff Data Request No. 0073.

<sup>3</sup> MAWC Response to Staff Data Request No. 0179.

<sup>4</sup> MAWC Response to Staff Data Request Nos. 0068 & 0074.

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1 A. According to MAWC, 162,611 customers were enrolled in paperless billing as  
2 of the end of June 2024. This represented approximately 32.82% of its customer base.<sup>5</sup>

3 Q. Does MAWC know why the enrollment rate for paperless billing is not higher?

4 A. Staff asked MAWC to provide its beliefs regarding low paperless billing  
5 adoption rates amongst its customers in Staff Data Request (“DR” or “DRs”) 0078. According  
6 to MAWC’s response, it believes that the two relevant factors are “generational preferences”  
7 and a “lack of awareness of paperless billing benefits.”

8 Q. Did MAWC provide any empirical evidence in support of those beliefs?

9 A. Yes. In response to Staff DR No. 0078.1, MAWC provided examples by means  
10 of two articles advocating for paperless billing, one from a newsletter at  
11 <https://www.questline.com><sup>6</sup> and another from <https://www.paylode.com>.<sup>7</sup> Both articles cite  
12 research exploring the generational preferences of customers. However, the Questline article  
13 appears to primarily discuss the generational differences in online bill payment (i.e., choosing  
14 to *pay* a bill online), not preferences for paperless billing (i.e., choosing to *receive* a bill  
15 electronically). Staff was unable to examine the research closer, as the links in the article do  
16 not direct to the research cited. The Paylode article does cite research indicating that younger  
17 customers are more likely to intend to switch at least one of their bills to paperless than older  
18 customers. However, the type of bill (utility, phone, mortgage, insurance, etc.) was not  
19 specified, and as of 2021 even the oldest customers surveyed were at 65% willingness. Neither  
20 article addresses customer awareness of the benefits of paperless billing, nor is any cited

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<sup>5</sup>MAWC Response to Staff Data Request No. 0072.

<sup>6</sup>[Energy Utility Bills: The Paperless Advantage - Questline Digital](#)

<sup>7</sup>[Paperless Billing: A Cost and Savings Guide for Businesses \(paylode.com\)](#)



1 research specific to MAWC customers, investor-owned utility customers or water and sewer  
2 service customers.

3 Q. Does MAWC have any empirical data gathered from its own customers  
4 indicating that generational preferences and a lack of awareness of the benefits of paperless  
5 billing are stymying paperless billing enrollment?

6 A. No. According to MAWC, it did not conduct any research regarding its  
7 customers' willingness to participate in paperless billing.<sup>8</sup> MAWC appears to rely on  
8 generalized studies.

9 Q. Does Staff agree with MAWC's conclusions?

10 A. Absent more relevant data, Staff is willing to concede that generational  
11 preferences and a lack of awareness of the benefits of paperless billing could potentially be  
12 factors in a general sense. However, Staff also notes that there are extraneous variables specific  
13 to MAWC water and sewer customers, such as the provision of an essential service, the  
14 social/cultural environment of those customers and the online portal through which MAWC  
15 customers would receive their bills, for which generalized studies may not account.

16 Q. Does Staff believe that generational preferences warrant an attempt to  
17 auto-enroll customers in paperless billing?

18 A. Absolutely not. 'Generational preferences' imply the customer is fully aware of  
19 paperless billing as an option, but has decided not to enroll. The exact reason for that decision  
20 could be anything from habitual preference to unfamiliarity with or distrust in technology. In  
21 any case, to attempt to automatically enroll such customers would be to ignore their preference  
22 and would likely cause confusion and deepen distrust.

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<sup>8</sup> MAWC Response to Staff Data Request No. 0077.

1 Q. Does Staff believe that a lack of awareness of the benefits of paperless billing  
2 warrants an attempt to auto-enroll customers in paperless billing?

3 A. No. Staff does not believe that customer unawareness is a sufficient reason to  
4 make decisions on behalf of uninformed customers. Furthermore, in MAWC's case, this  
5 argument relies upon the premise that MAWC's communication efforts to promote paperless  
6 billing have failed entirely.

7 Q. Can you elaborate?

8 A. Yes. According to MAWC, promotion of the paperless billing option is an  
9 ongoing effort for which it is unable to provide a start or end date. MAWC promotes paperless  
10 billing through bill inserts and onserts, email campaigns, social media, and on its website.  
11 Emails are sent to all MAWC customers who are enrolled in MyWater but who are not enrolled  
12 in paperless billing. Staff reviewed examples of these communications and found that all but  
13 one of them describe the benefits of paperless billing using terms such as "simple," "secure,"  
14 "clutter-free," "eco-friendly," and "convenient."<sup>9</sup> These are attached as Schedule CTT-d2. As  
15 these communications cite the benefits of paperless billing, a "lack of awareness of the benefits  
16 of paperless billing" implies that these communications were ineffective at best, if not wasteful.

17 Unfortunately, it is difficult to gauge the level of success. According to MAWC, it has  
18 not conducted any analyses of its promotional communications for paperless billing.<sup>10</sup> MAWC  
19 has also not conducted any research to determine its customers' awareness of paperless  
20 billing.<sup>11</sup> Furthermore, MAWC appears to have been uninterested in paperless billing  
21 enrollment rates at all until relatively recently. According to MAWC, it did not track the exact

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<sup>9</sup> MAWC Response to Staff Data Request Nos. 0071.1 & 0075.

<sup>10</sup> MAWC Response to Staff Data Request No. 0075.

<sup>11</sup> MAWC Response to Staff Data Request No. 0076.

1 number or percentage of customers enrolled in paperless billing until the end of 2023. For that  
2 reason, it was unable to provide Staff with any data on paperless billing enrollment prior to that  
3 time.<sup>12</sup> This is despite the fact MAWC had already decided as early as April 25, 2023, that it  
4 intended to pursue auto-enrolling customers in paperless billing.<sup>13</sup>

5 Q. Was Staff able to determine anything from the paperless billing enrollment data  
6 that was provided?

7 A. For the three quarters of data provided, Staff observed an average increase  
8 of .73% per quarter of the percentage of customers enrolled in paperless billing. As there is so  
9 little data available, Staff hesitates to draw any conclusions as to trends or causation.

10 Q. How would you summarize MAWC's paperless billing situation as of the  
11 present rate case?

12 A. After offering a paperless billing option for over a decade, MAWC has recently  
13 decided that the adoption rate amongst its customers is too low, and has even more recently  
14 decided to gather hard data to support that conclusion. It has expended very little effort in  
15 determining the reasons why this is the case, and instead has relied upon generalized analyses  
16 to inform its next steps.

17 Q. Does Staff have any other suggestions for why MAWC's paperless billing  
18 program may be "very limited in its usage" as described by Mr. Carlson on page 46, lines 7-8  
19 of his direct testimony?

20 A. Yes. Earlier in my testimony I mentioned the potential for extraneous variables  
21 to have an impact on paperless billing adoption rates. One of those variables is the usability of

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<sup>12</sup> MAWC Response to Staff Data Request No. 0072.

<sup>13</sup> MAWC presented Staff with its plans for automatically enrolling customers in paperless billing during an April 25, 2023 meeting with Staff.

1 the biller’s website. If customers have poor experiences with accessing or navigating the  
2 biller’s website on other occasions, those customers are less likely to enroll in a program that  
3 requires them to access that site regularly to view their bill, nor will they entrust that site with  
4 the only means by which they would be able to view their bill. According to MAWC’s Web  
5 Intercept Survey, only 31% of survey respondents indicated satisfaction with their experience  
6 with MyWater as of the end of second quarter 2024.<sup>14</sup>

7 Q. What is the Web Intercept Survey?

8 A. The Web Intercept Study is a survey of customers based on their experience with  
9 MyWater. It is offered as a pop-up to 40% of eligible customers while they are using MyWater.  
10 Site visitors are eligible if they have been on the site for at least fifteen (15) seconds, have web  
11 cookies enabled and if they have not been offered the survey within the past month.

12 Q. What do the respondents of the Web Intercept Survey have to say about  
13 MAWC’s website?

14 **2. Quarterly results (Missouri American Water customers, T2B% satisfaction):**

Q1 2022	Q2 2022	Q3 2022	Q4 2022	Q1 2023	Q2 2023	Q3 2023	Q4 2023	Q1 2024	Q2 2024
23%	18%	30%	32%	35%	35%	28%	33%	32%	31%

15  
16 A. Generally speaking, MAWC customers have not been satisfied with the  
17 MyWater experience for quite some time. As evidenced in the table above, the quarterly  
18 satisfaction rating has not risen above 35% since the beginning of 2022 and trended at an

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<sup>14</sup> MAWC Response to Staff Data Request No. 0070.

1 average of 32% for the time period during which MAWC has data on its paperless billing  
2 enrollment.

3 Staff's review of the customer comments found a few recurring themes regarding the  
4 website experience, including: 1) Website errors/crashes, 2) Device/browser compatibility  
5 issues, 3) Inability to perform intended task (e.g., bill payment), and 4) Inability to find sought  
6 information. Some of the recent comments are directly relevant to paperless billing, for  
7 example:

8 "I was trying to look up the actual bill and it would not let me" –June 12, 2024

9 "Just wanted to see old statements for January, February & March. Regret  
10 paperless billing when I can't access them at all now!" – April 5, 2024

11 "Even though I got an email stating that our bill was ready for review, I was  
12 unable to review or print it. The only bill is the previous bill and I have been  
13 trying to print it since 3/8/24. Even the other account's new bill is doing the  
14 same thing." – March 12, 2024

15 "I have paperless billing. I received notice that my current bill is available. The  
16 "current bill" is NOT current. It's been paid. I'd like to see my actual current  
17 bill but of course I can't do that. And the billing and payment history of my  
18 account is impossible to make sense of. This website is NOT helpful  
19 mainly because there's no email address to send questions and the phone number  
20 isn't any help on weekends. This the worse utility website I've ever come  
21 across." – March 11, 2024

22 "I want to print the March 2024 bill. There is only "payment" option, which I  
23 don't use. Please tell me how to print the bill. Thank you." – March 9, 2024

24 "When I pull up my bill for this month it only brings up the previous bill.  
25 On the website it shows my current balance but not able to bring up the  
26 statement." -March 7, 2024

27 "Web Site will not display current "My Bill" data. It is frozen on the Jan 2024  
28 billing data, showing "Due Date: Feb 23, 2024". "View Current Bill" show the  
29 actual current hard copy bill with actual amount due. Site does not display the  
30 updated, current amount due. What Gives???" -March 3, 2024

31 "Your website is awful and consistently locks up when going between different  
32 pages. It is not updated and has incorrect information in multiple places making  
33 it impossible to manage our account. I am unable to track water usage because

1 it rarely has up-to-date or accurate tracking info. It is inconsistent at providing  
2 actual meter readings and has so many issues there are too many to list. Look at  
3 the way Arkansas Water Department manages their website and has an app that  
4 is very user friendly.” -February 9, 2024

5 I am attempting to find my December bill and it is not in the system. I do not  
6 want to be late or have other issue since my last 3 bills were estimates. We did  
7 have somebody check the meter in November.” -January 4, 2024

8 “Site crashes. Unable to get downloads of previous bills. Unable to get details  
9 of water usage. Site kicks me out continuously.” -December 19, 2023

10 “Invoices are never available on due date. (12/15/23) today is 12/19/23 still not  
11 available” -December 19, 2023

12 “Everytime I go to pay my bill through the website I have to constantly flip my  
13 phone in circles to reach a corner of the button to pay the actual bill.. this is  
14 ridiculous I always have to do it 3or.4times.. don't let me get discouraged and  
15 click off to have to come back and repeat those steps .. I just started with  
16 American water so I feel bad for the long term costumers or the seniors smh  
17 please fix ugh” -November 19, 2023

18 “None of the invoices for our account are generating so I can print them out. If  
19 I can not see or print the bill, I can't pay the bill.” -October 19, 2023

20 “I tried to change my email address but your website would not make the change.  
21 I spend almost 30 minutes trying.” -October 4, 2023<sup>15</sup>

22  
23 Please note that the selection of customer comments above is meant to be emblematic,  
24 not exhaustive. Schedule CTT-d3 provides all customer comments from the start of  
25 October 2023 to the end of June 2024. For brevity's sake, only the 302 comments received  
26 during the period of time MAWC has paperless billing enrollment data are included.

27 Q. What conclusions did Staff reach in reviewing the Web Intercept Survey data?

28 A. The four recurring themes noted above have been persistent elements of the  
29 customer experience when accessing MyWater since at least the beginning of 2022.  
30 Many customers' descriptions indicate multiple encounters with the same issue over an

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<sup>15</sup> MAWC Response to Staff Data Request No. 0070. Customer comments have been copied verbatim.

1 extended period of time, rather than one-time events that could be explained by temporary  
2 outages or maintenance. From Staff's perspective, these issues present a significant deterrent  
3 to anyone who might otherwise show interest in the concept of paperless billing.

4 Q. What does Staff recommend?

5 A. Staff recommends that MAWC make use of the feedback it receives from its  
6 customers to make improvements to its website and to MyWater. Delivering an improved  
7 website experience that increases customer satisfaction will likely, over time, decrease  
8 customer hesitation to adopt paperless billing. That being said, paperless billing enrollment  
9 should be a side benefit rather than the main goal. Customers are paying for MAWC's customer  
10 service, which includes a functional website that delivers promised services and should be  
11 responsive to customer feedback.

12 Q. Before discussing the proposal itself, does Staff have any other observations  
13 regarding the information you have covered up to this point?

14 A. Briefly, yes. While reviewing the Paylode article provided by MAWC, Staff  
15 noted that the author gave the following warning that is pertinent to MAWC's Paperless  
16 Billing proposal:

17 "We don't recommend going full rogue and switching everyone automatically  
18 [Emphasis Added.], or eliminating paper statements without an alternative. We  
19 do recommend taking a strategic approach to realize the full value while also  
20 keeping customers happy and engaged.

21 The risk is cutting off those who are not digitally connected to their bank, or  
22 without access to Internet, and causing yourself a PR mishap."<sup>16</sup>

23 **MAWC Paperless Billing Proposal**

24 Q. Please explain the details of MAWC's Paperless Billing Proposal.

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<sup>16</sup> MAWC's Response to Staff Data Request No. 0078.1.

1           A.     Approximately forty-five (45) days<sup>17</sup> before automatic enrollment, MAWC will  
2 send an email to all paper-billed customers who have an active MyWater account and a valid  
3 email address on file. This will be approximately 125,000 MAWC customers, which is  
4 approximately 25% of MAWC's customer base.<sup>18</sup> The email will inform the customer that  
5 MAWC will convert the customer's account to paperless billing on the automatic enrollment  
6 date unless the customer takes action by opting out before the deadline, which would be several  
7 days before automatic enrollment. Customers who wish to continue receiving paper bills are  
8 directed to click a button in the email, and customers who may decide later to unenroll are  
9 directed to do so on MyWater. Any customer who received the first email (i.e., the email did  
10 not bounce) and does not opt out or unsubscribe from notifications will receive a postcard  
11 approximately three (3) weeks after the first email containing similar information, and a second  
12 email reiterating the same information as the first email approximately one (1) week before the  
13 deadline. Around forty-five (45) days after delivery of the first email, any customer who has  
14 not contacted MAWC to opt-out will be automatically enrolled in paperless billing.

15           Q.     Has Staff reviewed the communications that MAWC proposes to send to  
16 customers for the automatic paperless billing enrollment?

17           A.     Yes. Staff reviewed MAWC proposed communications<sup>19</sup> and has concerns with  
18 the details presented in both the email and the postcard.

19           Q.     What is Staff's concern with the email?

20           A.     Staff's concern with the email is that it appears to assume the customer is  
21 enrolled in Auto Pay. It uses statements such as "We're glad you're already enjoying the

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<sup>17</sup> The 45-day timeline is extrapolated from the Indiana pilot, provided in MAWC's Response to Staff Data Request No. 0080. MAWC indicated in its response to Staff Data Request 0089.1 that it intends to follow a similar timeline.

<sup>18</sup> MAWC's Response to Staff Data Request No. 0093.1.

<sup>19</sup> MAWC's Response to Staff Data Request No. 0088.



1 benefits of paying your bill automatically through our Auto Pay program,” and “Your bills will  
2 continue to be automatically paid as part of the Auto Pay program.” This will be confusing to  
3 customers who have a MyWater account (and thus qualify for the email) but do not have Auto  
4 Pay set up. Some customers may conclude that the email might not pertain to them and was  
5 sent in error. However, MAWC indicated in its response to DR 0088.1 that it does not intend  
6 to send different communications for customers who are eligible for paperless billing  
7 enrollment but are not enrolled in Auto Pay.

8 Q. Does Staff know why the email is written to only apply to Auto Pay customers?

9 A. Not for certain. However, when MAWC initially approached Staff with its  
10 paperless billing proposal during the April 2023 meeting, it proposed a two-phase  
11 auto-enrollment. The first phase would target customers who had an email on file and were on  
12 Auto Pay. The second phase would target customers who had an email on file but were not  
13 enrolled in Auto Pay. This may be where the language originated. That being said, the current  
14 proposal outlined in Mr. Carlson’s testimony, from page 48, line 11 to page 49, line 2, is a  
15 single-phase auto-enrollment targeting all customers who have a MyWater account, regardless  
16 of whether they are enrolled in Auto Pay.

17 Q. What is Staff’s concern with the postcard?

18 A. Staff’s concern with the sample postcard is that it informs the customer “If you  
19 prefer to continue receiving paper bills, email us by March XX, 2023, at  
20 [gopaperless@amwater.com](mailto:gopaperless@amwater.com).” Staff asked MAWC in DR 0088.1 what information customers  
21 need to provide in the email in order to opt out of paperless billing. MAWC’s response  
22 indicated only that a customer must email MAWC with the email address associated with their  
23 account stating that they wish to opt out of paperless bill. That information is not presented on

1 the postcard and may cause additional hassle for customers who utilize more than one email  
2 address.

3 Q. How many customers does MAWC believe this proposal will enroll in  
4 paperless billing?

5 A. According to MAWC, of the 125,000 customers that will be targeted for  
6 automatic enrollment, it anticipates that approximately 80,000 customers will continue  
7 receiving a paperless bill after enrollment.<sup>20</sup>

8 Q. Did MAWC provide the basis for its anticipated enrollment?

9 A. Yes. It is based on the experiences of American Water Works Company  
10 (“AWWC”) subsidiaries in other states, which indicate that around two-thirds of customers  
11 targeted for auto-enrollment in paperless billing through this process will remain in  
12 paperless billing.

13 Q. Did Staff perform any research into the experiences of other AWWC companies  
14 with this auto-enrollment program?

15 A. Yes, Staff reviewed the Indiana pilot referenced on page 47, line 2 of  
16 Mr. Carlson’s direct testimony in detail. It also asked for the results of any similar programs  
17 conducted in other states.

18 Q. What did Staff find?

19 A. As of July 2024, MAWC’s affiliates in New Jersey, Virginia, Indiana and  
20 Kentucky had conducted paperless billing auto-enrollment programs similar to that proposed  
21 in the present case. Indiana-American Water, one of the first AWWC subsidiaries to enact the

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<sup>20</sup> MAWC’s Response to Staff Data Request No. 0093.1.

1 auto-enrollment program, enacted its conversion June 14, 2023-August 1, 2023.<sup>21</sup> Of the  
2 190,000 eligible<sup>22</sup> customers from all states who were notified of the pending auto-enrollment,  
3 approximately 65% remained on paperless billing following the conversion. Staff also learned  
4 that, of the approximately 35% of customers who opted out of paperless billing, 10% of  
5 customers did so after being auto-enrolled.<sup>23</sup>

6 Q. What is the significance of customers returning to paperless billing after being  
7 auto-enrolled?

8 A. The fact that the customers unenrolled after the deadline suggests those  
9 customers were either unhappy with paperless billing or were not aware of the pending  
10 auto-enrollment and the need to opt out. Some of the customer feedback from the Indiana  
11 customers following the conversion supports this conclusion. For example:

12 "I really prefer the paper bill but was forced to receive my bill  
13 online." –January 9, 2024

14 "It was difficult because the 3 times I tried on line the moving to a different page  
15 did not work. When I called and said to call me back it never happen. Your  
16 recording hung up on me twice. Then your company sign me up for paperless  
17 billing without asking. I need my bills. Also, My water is not good enough to  
18 drink. I got bladder cancer I blame the water. It dries out the skin and so much  
19 rust in it but need it anyways." -November 8, 2023

20 "Why does this company think everyone have ONLINE Payment. If use your  
21 automatic service you have paid a fee. A lot of Seniors do not have a computer.  
22 Check other people out about their water charges they are paying the same  
23 amount regardless of their house hold if only one or 4 in the house. Use to have  
24 options on how to paid your bill before it went paperless. Me personally  
25 don't check my emails everyday to see that have a water bill. Your

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<sup>21</sup> MAWC Response to Staff Data Request No. 0080.

<sup>22</sup> Paper-billed with an active MyWater account and a valid email address on file

<sup>23</sup> MAWC Response to Staff Data Request No. 0079. It is worth noting that the customer base for New Jersey, Indiana, Virginia, and Kentucky was a combined 1,207,100 as of December 2023, according to MAWC's annual Cost Allocation Manual filed March 15, 2024. This means that, for unknown reasons, only 15.7% of customers were eligible for auto-enrollment in those four states, which is much lower than the 25% that are eligible in Missouri.

1 survey ask about communication, you are not talking to a person it is all  
2 automated.” – November 9, 2023

3 “I was very unhappy to have my bill switched to online instead of paper. Very  
4 disappointed” – November 28, 2023

5 “did not like that i was forced to participate into paperless billing|remove the  
6 requirement to know the billing number to pay/access information online. that  
7 is a ridiculously long number that someone would need to have written down to  
8 use the online options, and if they didn't save a bill with the account number on  
9 it, or have to call and get the number” – November 8, 2023<sup>24</sup>

10 Q. On page 46, line 5 of Jody L. Carlson’s direct testimony, he suggests that one of  
11 the benefits of paperless billing is an increase in customer satisfaction. Did Staff examine  
12 whether or not this was the result when the other AWWC companies auto-enrolled its customers  
13 in paperless billing?

14 A. Yes, specifically for the Indiana pilot since it was cited in Mr. Carlson’s  
15 testimony. Although Staff does not necessarily dispute that paperless billing could increase  
16 customer satisfaction, the method of implementation is just as important as the benefits,  
17 particularly when it comes to customer reaction.

18 Q. Does data from the Indiana pilot suggest a resulting increase in  
19 customer satisfaction?

20 A. In Staff’s opinion, the data MAWC provided as support is inconclusive at best.  
21 MAWC offered two statistics from the Indiana affiliate in support of its position: 1) Net  
22 Promotor Score (“NPS”), which gauges customer loyalty, satisfaction, and enthusiasm with a  
23 company, and 2) the percentage of customers satisfied with the amount of time given to pay  
24 their bill. The data that MAWC provided shows that, although NPS did increase in the months  
25 after the auto-enrollment deadline, NPS increased both for customers who had an active

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<sup>24</sup> MAWC’s Response to Staff Data Request No. 0081. Customer comments have been copied verbatim.

1 MyWater account and those who did not. Put another way, it increased whether the customer  
2 would have been eligible for auto-enrollment in paperless billing or not.

3 The percentage of customers indicating satisfaction with the amount of time given to  
4 pay the bill increased after the transition for customers who received a paper bill, but decreased  
5 for customers receiving a paperless bill. Meanwhile, the percentage of active MyWater users  
6 who were satisfied with the amount of time given to pay the bill did not increase, but the  
7 percentage of non-MyWater users who were satisfied with the bill pay time period did increase.  
8 In other words, the customers not impacted by the auto-enrollment (paper billed, not enrolled  
9 in MyWater) experienced an increase in satisfaction, while the groups including those impacted  
10 (paperless billed, enrolled in MyWater) experienced either no change or a decrease in  
11 satisfaction.<sup>25</sup>

12 These data points suggest that there were other factors at play in influencing the NPS  
13 and bill pay-time period satisfaction in the months either before or after the conversion.  
14 Because neither statistic asks specific questions to auto-enrolled customers about their  
15 experience with auto-enrollment, this data is not particularly helpful in gauging their  
16 satisfaction after being auto-enrolled in paperless billing and should not be relied upon as  
17 supporting evidence.

18 **Commission Rule 20 CSR 4240 13.015(1)(B)**

19 Q. What is Commission Rule 20 CSR 4240 13.015(1)(B)?

20 A. Commission Rule 20 CSR 4240 13.015(1)(B) defines what constitutes a  
21 customer bill. It states: "Bill means a written demand, including, if agreed to by the customer

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<sup>25</sup> MAWC's Response to Staff Data Request No. 0083.1.

1 and the utility, an electronic demand, [Emphasis added.] for payment for service or equipment  
2 and the taxes, surcharges, and franchise fees;”.

3 Q. How does it relate to the present topic?

4 A. Staff’s position is that the rule, particularly the underlined language, precludes  
5 MAWC’s efforts to automatically enroll customers in electronic (i.e., paperless) billing unless  
6 they take action. Rather than being presented with the requirement to opt out, customers must  
7 choose for themselves to opt in to paperless billing.

8 Q. How is MAWC interpreting the rule?

9 A. MAWC’s belief is that the rule does not require a particular form of agreement.  
10 MAWC cited Black’s Law Dictionary (Abridged Fifth Edition) for the definition to “agree” as,  
11 “To concur, come into harmony; give mutual assent; united in mental action; exchange  
12 promises; make an agreement; approve or adopt”, which also does not require a particular form  
13 of agreement. As such, “Because of the nature of the Company’s interactions with the targeted  
14 customers, paperless billing will have been agreed to by the customers that have decided to not  
15 opt-out and will have satisfied the conditions set forth in Commission Rule 20 CSR  
16 4240-13.015(1)(B).”<sup>26</sup>

17 Q. Does Staff agree with this interpretation?

18 A. No, because MAWC’s proposal is to change the default, not to seek agreement.  
19 20 CSR 4240 13.020(1)<sup>27</sup> requires utility companies, regardless of whether the customer agrees,  
20 to render a bill to customers for each billing period. 20 CSR 4240 13.015(1)(B) requires  
21 agreement (i.e., mutual assent) for paperless billing, but *not* for written (i.e., paper) billing.

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<sup>26</sup> MAWC Response to Staff Data Request No. 0087.

<sup>27</sup> “A utility shall render a bill for each billing period to every residential customer in accordance with commission rules and its approved tariff.”

1 If utilities must render a bill, but also must come to an agreement with the customer in order to  
2 render a paperless bill, then logically a paper bill is the default bill type in Chapter 13. In  
3 practice this means that, absent action or input from the customer, bills are issued in paper form.  
4 Customers who desire a paperless bill inform their utility company of their interest and both  
5 sides then agree that the bill should be rendered in an electronic format.

6 MAWC's proposal is the precise opposite of this dynamic and thereby in contradiction  
7 with Chapter 13. In this proposal, customers who desire a paper bill must inform MAWC of  
8 their interest and subsequently both parties *agree* to keep the customer on paper billing.  
9 For paperless billing, MAWC will construe a lack of customer action or input as reason to  
10 default the customer to a paperless bill, just as utilities do now for paper billing as per  
11 Chapter 13.

12 Q. Should the Commission's decision on this issue hinge solely on its interpretation  
13 of what should be considered agreement for Chapter 13 purposes?

14 A. Actually, no. MAWC's own statements contradict the rationale for assuming  
15 that its communications campaign will be sufficient to infer customer inaction as informed  
16 consent. Furthermore, MAWC's proposed communication campaign is not sufficient basis to  
17 make such an assumption.

18 Q. Please explain.

19 A. Earlier in my testimony I discussed MAWC's belief that low paperless billing  
20 enrollment rates is the result of generational preferences and a lack of awareness of the benefits  
21 of paperless billing. I also detailed how MAWC has promoted paperless billing through  
22 multiple channels, including email campaigns sent to all MAWC customers who are enrolled

1 in MyWater but who are not enrolled in paperless billing. Those communications usually  
2 encouraged enrollment by touting the benefits of paperless billing.<sup>28</sup>

3 This presents a significant flaw in the logic of MAWC's proposal. If MAWC customers  
4 received and read those communications, then they are aware of the benefits of paperless billing  
5 and, through inaction, have already made the choice for themselves not to participate. However,  
6 if it is MAWC's belief that customers are unaware of the benefits of paperless billing, then that  
7 belief is also implicit acknowledgement that those customers did not receive or review  
8 MAWC's paperless billing promotional communications, including the emails. And yet,  
9 paradoxically, MAWC's current proposal intends to use the same communication channels and  
10 assumes that all customers will receive and read those communications.

11 Q. According to page 48, lines 12-20 of Mr. Carlson testimony, MAWC proposal  
12 is for three (3) communications using two (2) different channels, targeting only people with an  
13 active MyWater account and a valid email address. Is this sufficient to assume that targeted  
14 customers will be informed, active participants in paperless billing?

15 A. No. The proposal assumes that targeted customers routinely access the internet  
16 and their emails regularly enough to see these communications and then to receive a paperless  
17 bill on a monthly basis without experiencing any undue burden. However, the nature of the  
18 communications does not guarantee this situation.

19 It is important to note that MyWater accounts do not go inactive, and a valid email  
20 address is required to register for MyWater.<sup>29</sup> Whether the customer frequently utilizes  
21 MyWater to manage their account, or if the customer simply set up a MyWater account several

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<sup>28</sup> See Schedule CTT-d2.

<sup>29</sup> MAWC Response to Staff Data Request No. 0179.



1 years ago to pay one bill and has not used it since that time, in either case the customer would  
2 be targeted for auto-enrollment. An email address associated with a MyWater account will be  
3 valid unless the email account is no longer active. Staff reviewed the inactivity policy of the  
4 most popular email service, Gmail, and found that a Google Account is considered active as  
5 long as the account holder uses *any* Google Account service, not limited to Gmail, over a period  
6 of two (2) years.<sup>30</sup> This means that, for example, if a customer provided a secondary email  
7 address for MyWater account setup but has not checked that email up to two (2) years, the email  
8 address will still be considered valid. The account would also still be active if the user has not  
9 checked their email in more than two years, but has used Google Search or watched a YouTube  
10 video, for example, while logged in. Thus, MAWC’s proposal does not effectively single out  
11 customers who are active MyWater users or who routinely review their emails.

12 Q. Would the postcard make up for this oversight?

13 A. Not for the purposes of ensuring that customers are aware of the impending  
14 auto-enrollment and thus agree to it through their inaction. MAWC has stated that it only  
15 intends to verify email delivery. It will not verify if the postcard was received.<sup>31</sup> Therefore,  
16 from MAWC’s perspective, the postcard should not play a role in determining whether the  
17 customer has agreed to paperless billing after being duly notified.

18 Q. According to page 48, lines 15-17, of Mr. Carlson’s testimony, “Email delivery  
19 and opening will be verified electronically to ensure customers have had access to, and opened,  
20 the message.” Does this not mean MAWC will confirm that customers both received and read  
21 the email and were therefore notified?

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<sup>30</sup> [Inactive Google Account Policy - Google Account Help](#)

<sup>31</sup> MAWC Response to Staff Data Request No. 0089.

1           A.     No, and this is most important: According to MAWC, Mr. Carlson’s testimony  
2 will need to be corrected to reflect that MAWC will only verify the email was *delivered* (i.e.,  
3 did not bounce), not opened. MAWC has no plans to verify if the email was actually read by  
4 the customer.<sup>32</sup> In essence, this means MAWC is proposing to assume “agreement”, on which  
5 determines the preservation of customers’ Chapter 13 protections, on whether or not two emails  
6 bounce. As I explained above with the inactivity period for email accounts, successful delivery  
7 of an email does *not* guarantee the email will be reviewed within the proposed 45-day time  
8 period for opt-out.

9           Q.     Is Staff opposed to this approach?

10          A.     Yes. The residential customer protections provided for in Chapter 13 should not  
11 be taken lightly. As I discussed earlier in my testimony, 10% of customers returned to paper  
12 billing after enrollment in similar auto-enrollment programs, and at least some of those  
13 customers were unaware of the need to opt-out of paperless billing. That 10% is built in to the  
14 number of customers MAWC expects will opt-out of paperless billing should this proposal be  
15 implemented. Even if the communications plan is sufficient for most customers, this means up  
16 to 10% of customers are expected to be converted to paperless billing without their knowledge  
17 and agreement. In other words, up to 10% of customers are *expected* to have their Chapter 13  
18 rights violated in this proposal.

19                   **Staff’s Position on MAWC’s Paperless Billing Proposal**

20          Q.     What is Staff’s recommendation regarding MAWC’s Paperless Billing Proposal  
21 in the present rate case?

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<sup>32</sup> See Schedule CTT-d4, MAWC Response to Staff Data Request No. 0089.

1           A.     Staff recommends that the Commission reject this proposal in its entirety. There  
2 are clear contradictions with the residential customer protections provided for in Commission  
3 Rules. There is also very little supporting evidence to justify resorting to auto-enrollment and  
4 strong indications that the auto-enrollment experience as proposed will have negative  
5 repercussions for customers.

6           MAWC has offered a paperless billing option for over a decade, and has invested effort  
7 in communicating the offer to all of its eligible customers. MAWC's argument rests on the  
8 premise that inaction, after due notification, can be construed as active agreement. If so, then  
9 one must also accept that customers' inaction to date, after due notification of the existence of  
10 paperless billing, is equally indicative of customers making a conscious decision not  
11 to participate.

12           As an alternative to this proposal, Staff suggests that MAWC work to determine why  
13 many of its customers have made the decision not to participate in paperless billing.  
14 That customer feedback can then be leveraged to address concerns and tailor messaging so  
15 customers, of their own volition, will choose to participate in paperless billing.

16           Q.     Should your testimony regarding MAWC's Paperless Billing Proposal be  
17 construed as Staff opposition to the concept of paperless billing?

18           A.     No. Staff recognizes that there are objective and subjective benefits to paperless  
19 billing for both customers and utilities, and is not opposed to Commission-regulated utilities  
20 offering or promoting paperless billing to its customers. Staff's position is that customers  
21 should choose to initiate paperless billing of their own volition, rather than the utility company  
22 making the choice for them. They should be given the choice to opt-in to the program, not opt

1 out, and certainly not auto-enrolled without their input. Staff's position on this issue is  
2 consistent with its stance in prior cases.<sup>33</sup>

3 Q. On page 48, lines 20-22 of Mr. Carlson's testimony, he indicates that all new  
4 customers who sign up for MyWater will be defaulted to paperless billing unless they opt out.  
5 Would Staff also be opposed to this aspect of the proposal?

6 A. Yes. For the same reasons as outlined above, Staff is opposed to any paperless  
7 billing initiative that requires customers to opt-out of a default choice of paperless billing  
8 instead of opting in.

9 **CREDIT CARD FEE MESSAGING**

10 Q. Does MAWC currently charge a separate service fee for credit/debit  
11 card payments?

12 A. No. After case No. WR-2020-0344, MAWC began incorporating credit/debit  
13 card fee payment into its cost of service, instead of charging customers a separate fee  
14 upon payment.

15 Q. Why is Staff raising this issue in the present rate case?

16 A. In reviewing customer comments from the Web Intercept Survey, Staff noted  
17 that there are Missouri customers angry and frustrated because of their belief that MAWC  
18 would charge them the service fee. In some cases, it led to customers eschewing their planned  
19 method of payment. For example:

20 "I was in the process of setting up monthly automatic bill payment, but stopped  
21 that process when I saw the notation about incurring a \$1.95 processing fee.  
22 I was already unhappy about your removal of the waiver of the additional billing  
23 fee of nearly \$10/month (always the largest part of my low usage monthly cost)

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<sup>33</sup> See the direct and surrebuttal testimony of Contessa King in Case No. ER-2022-0337 and the rebuttal testimony of Charles Tyrone Thomason in Case No. WR-2024-0104.

1 for low fixed income seniors, like myself, and I refuse to pay yet another fee to  
2 get you paid. ðŸ˜ƒ“ðŸ˜~–“ - May 3, 2024

3 “You are horrible for charging a fee to pay a bill. It's 2024!!!!!!” – April 4, 2024

4 “Is there a usage fee or charge to enroll a credit card for autopay or not? How  
5 much it it exactly? Info was vague so I quit the set up. I have tried to enroll in  
6 autopay using my bank info several times over the years but was unsuccessful  
7 each time and incurred late charges etc. My water bill is the ONLY bill I am  
8 incapable of setting up with autopay. Customer service reps are super friendly  
9 but unable to help get me set up. I wish there was a way to send test charge to  
10 verify the account or clearer info could be provided. Interestingly I have several  
11 friends whoâ€™ve said the same thing so itâ€™s not just me who is having  
12 these challenges.” – August 7, 2023<sup>34</sup>

13 Q. Did Staff investigate further?

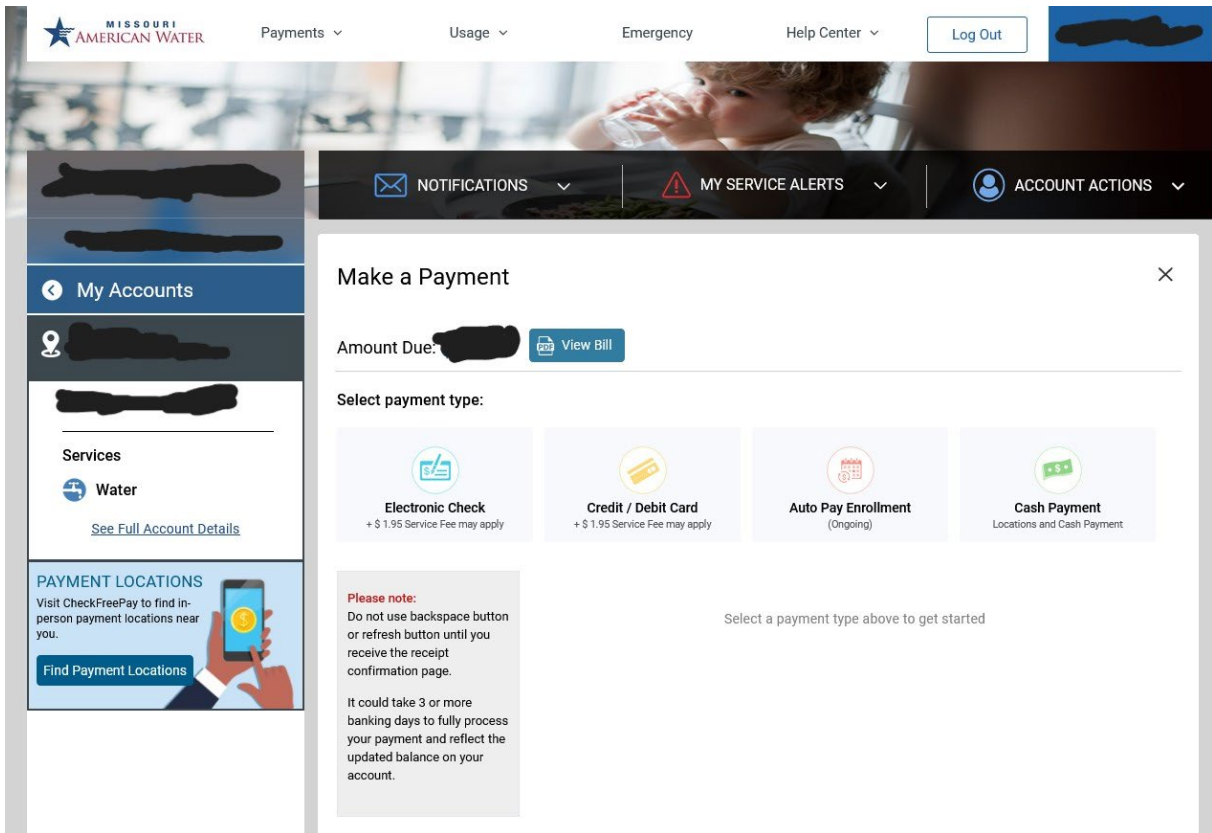
14 A. Yes. Staff accessed MyWater to gain a customer’s perspective of making a  
15 payment. Staff did not find any indication that MAWC customers are paying the service fee  
16 via MyWater or for automatic payments. However, Staff did take note of messaging on  
17 MyWater informing customers that “a +\$1.95 Service Fee may apply” for electronic check and  
18 credit/debit card payment types. There is no other information on the page that informs the  
19 customer whether or not the fee will apply for their payment. The only way a customer can  
20 determine whether the fee applies to them is if they proceed with their payment and review the  
21 total payment before confirmation. Customers who are annoyed by the service fee may not  
22 proceed any further to confirm whether or not the fee applies to them.

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<sup>34</sup>MAWC Response to Staff Data Request No. 0070. Customer comments have been copied verbatim.

Direct / Rebuttal Testimony of  
Charles Tyrone Thomason

1



2

3 Q. Has this issue come up before?

4 A. Yes. During Case No. WA-2022-0229, Staff noticed that MAWC's customer  
5 communications and website still made reference to the fee and communicated its concerns to  
6 MAWC. MAWC subsequently removed references to the fee in the places where it could.  
7 However, some locations, specifically page 2 of the customer bill and the MyWater bill  
8 payment screen, are the same across American Water and thus references to the fee could not  
9 be removed without removing pertinent information for customers in states where the fee  
10 still applies.

11 Q. Does Staff have a recommendation?

1           A.     Yes. Staff recommends that MAWC consider making a change to MyWater so  
2 that it is clearer to customers whether or not they will be charged the service fee. This could  
3 entail, for example, marking the text stating that the fee “may” apply with an asterisk linking to  
4 a footnote explanation of which states do (or do not) charge the fee. Another potential solution  
5 could entail a mouse-over text box that lists the applicable states.

6     **RECOMMENDATIONS**

7           Q.     Please summarize your recommendations for this case.

8           A.     Staff’s recommendations are:

- 9                   1) That the Commission reject MAWC’s Paperless Billing Proposal in its entirety.  
10                   2) That MAWC use the feedback it receives from its customers to make  
11                   improvements to its website and to MyWater.  
12                   3) That MAWC consider making a change to MyWater so that it is clearer to  
13                   customers whether or not they will be charged the service fee.

14          Q.     Does this conclude your direct / rebuttal testimony?

15          A.     Yes it does.

**BEFORE THE PUBLIC SERVICE COMMISSION**

**OF THE STATE OF MISSOURI**

In the Matter of Missouri-American Water Company's )  
Request for Authority to Implement a General Rate ) Case No. WR-2024-0320  
Increase for Water and Sewer Service Provided in )  
Missouri Service Areas )

**AFFIDAVIT OF CHARLES TYRONE THOMASON**

STATE OF MISSOURI )  
 ) ss.  
COUNTY OF COLE )

COMES NOW CHARLES TYRONE THOMASON and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Direct / Rebuttal Testimony of Charles Tyrone Thomason*; and that the same is true and correct according to his best knowledge and belief.

Further the Affiant sayeth not.

  
CHARLES TYRONE THOMASON

**JURAT**

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 26<sup>th</sup> day of November 2024.



  
Notary Public



## Charles “Tyrone” Thomason

### Present Position:

I am a Senior Research/Data Analyst in the Customer Experience Department of the Financial and Business Analysis Division of the Missouri Public Service Commission. I have been employed by the Missouri Public Service Commission since December 2021.

### Educational Background and Work Experience:

I earned a Bachelor of Arts degree in History and Psychology from The University of Alabama in Tuscaloosa, Alabama in 2014, during which I took coursework on statistics and quantitative research. I earned a Master of Arts degree in History from The University of Alabama in 2019.

I was previously employed for six months as an Adult Education Instructor teaching Social Studies and Language Arts at Cornerstones Career Learning Center in Huron, South Dakota. Prior to that, I was a pre-calculus tutor for Shelton State Community College in Tuscaloosa, Alabama for 2 years and a Graduate Teaching Assistant and Instructor for one year at The University of Alabama.

### Case Participation:

<u>Company Name</u>	<u>Case Number</u>	<u>Case Type / Type of Testimony</u>	<u>Utility Type</u>
Spire Missouri Inc.	GO-2022-0022	Investigatory Docket- Staff Report	Gas
Missouri American Water Company	WA-2022-0229	Certificate of Convenience and Necessity – Staff Recommendation	Water
Union Electric Company d/b/a Ameren Missouri	EC-2022-0291	Formal Complaint- Staff Report	Electric
Missouri American Water Company	WA-2022-0293	Certificate of Convenience and Necessity – Staff Recommendation	Water
Missouri American Water Company	WR-2022-0303	Rate Case- Direct Testimony	Water
Missouri American Water Company	WA-2022-0361	Certificate of Convenience and Necessity – Staff Recommendation	Water
Raytown Water Company	WC-2023-0166	Formal Complaint- Staff Report	Water
Office of Public Counsel	AX-2023-0175	Rulemaking Docket- Live Testimony	All
Evergy Missouri West Inc.	EC-2023-0248	Formal Complaint- Staff Report	Electric
Charles A. Harter	AX-2023-0287	Rulemaking Docket- Staff Report	All
Spire Missouri Inc.	GC-2023-0333	Formal Complaint- Staff Report	Gas
Evergy Missouri West Inc.	EC-2023-0433	Formal Complaint- Staff Report	Electric
Confluence Rivers	WA-2023-0398	Certificate of Convenience and Necessity – Staff Recommendation	Water
Liberty Utilities (Midstates Natural Gas)	GE-2024-0046	Variance Request- Staff Recommendation	Gas
Confluence Rivers	SA-2024-0129	Certificate of Convenience and Necessity – Staff Recommendation	Sewer
Spire Missouri Inc.	GC-2024-0113	Formal Complaint- Staff Report	Gas
Empire District Gas Company	GE-2024-0201	Variance Request- Staff Recommendation	Gas
Liberty Utilities (Missouri Water) LLC	WE-2024-0202	Variance Request- Staff Recommendation	Water
Liberty Utilities (Missouri Water) LLC	SE-2024-0203	Variance Request- Staff Recommendation	Sewer

<b><u>Company Name</u></b>	<b><u>Case Number</u></b>	<b><u>Case Type / Type of Testimony</u></b>	<b><u>Utility Type</u></b>
Empire District Electric Company	EE-2024-0261	Variance Request- Staff Recommendation	Electric
Evergy Missouri Metro Inc.	EC-2024-0289	Formal Complaint- Staff Report	Electric
Spire Missouri Inc.	GC-2024-0290	Formal Complaint- Staff Report	Gas
Liberty Utilities (Midstates Natural Gas)	GR-2024-0106	Rate Case- Direct Testimony	Gas
Liberty Utilities (Missouri Water) LLC	WR-2024-0104	Rate Case- Rebuttal Testimony	Water

Open now to enroll



Hi MO Data Scenario 8,

Enroll in paperless billing today to receive a convenient email notification when your bill is ready to view and pay online through our customer portal, MyWater. Like your paper bill, the email will contain key information including your amount due and due date. Simply click the button below to [enroll!](#)

[GO PAPERLESS NOW >](#)

**Account Details**

**Account Number Ending:** 90008  
**Service Address:** 1017 Data Scenario 8 CT

**Account Management**

From [MyWater online](#), you can:

- Sign up for auto pay
- Go paperless for billing

- 
- Update account information
- 

American Water Customer Service, PO Box 2798, Camden, NJ 08101

Tel: [Contact Us](#) | Website: [amwater.com](http://amwater.com)

Please add [Customer\\_Service@amwater.com](mailto:Customer_Service@amwater.com) to your address book.

This email was sent to [tester@usa.striata.com](mailto:tester@usa.striata.com). If you need to opt-out [unsubscribe here](#).

# TWO WAYS TO SIMPLIFY AND GO PAPERLESS



**MORE CONVENIENCE. LESS CLUTTER. SECURE.**



## Receive your bill electronically with **PAPERLESS BILLING**

We'll send you an email with the amount due, the due date and a link to view your bill online (along with any materials that would have been included with your paper bill). We'll also email service-related communications to you.

**It's simple, secure and clutter-free!**

Enroll in **Paperless Billing** and **Auto Pay** on MyWater at [amwater.com/mywater](http://amwater.com/mywater).

## Pay your bill electronically with **AUTO PAY**



Take it one step further and go entirely paperless. Enroll in **Auto Pay**, and your bill will be paid on time, every time, automatically on the due date.

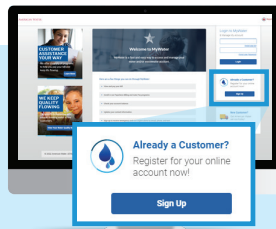
**NEW** Customers can now enroll in Auto Pay using their credit card!

Now, you can choose to have your monthly bill automatically applied to your credit card or deducted directly from your checking or savings account. **No stamps required!**



## NOT ENROLLED IN MYWATER?

Visit [amwater.com/mywater](http://amwater.com/mywater) and click on **Sign Up**. Have your account number handy.



WE KEEP LIFE FLOWING®

## Paperless & AutoPay Toolkit – Social Media Copy

\*Suggested, please go through your state review process before posting.

The below MEMES have been uploaded to Hootsuite. Please schedule your post(s) through Hootsuite, so we can track use/engagement for all states.

**Any time you use any of these assets this year, please add the campaign named: Paperless**

- **Hootsuite instructions for scheduling the static SM assets:**  
Hootsuite Instructions.docx
- **Need assistance with Hootsuite?** Reach out to Alicia Barbieri or Beth DePoy.

Link to download the memes: Memes

### MEMES



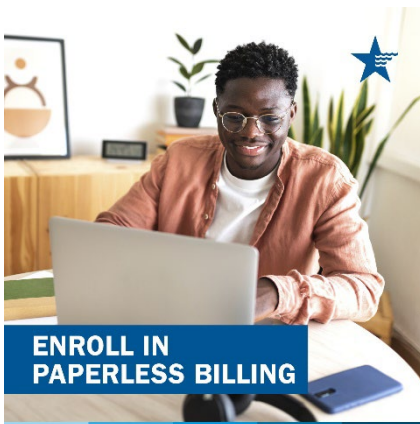
### SUGGESTED COPY

Go paperless by signing up for Paperless Billing via MyWater at [amwater.com/mywater](http://amwater.com/mywater). While you're at it, consider going entirely paperless by signing up for Auto Pay as well. It's simple, secure and eco-friendly!

### SUGGESTED COPY

Enrolling in Paperless Billing and Auto Pay couldn't be easier with MyWater. Enroll today at

amwater.com/mywater. This is just one example of how you can manage your account online. It's simple, secure and eco-friendly!



**SUGGESTED COPY**

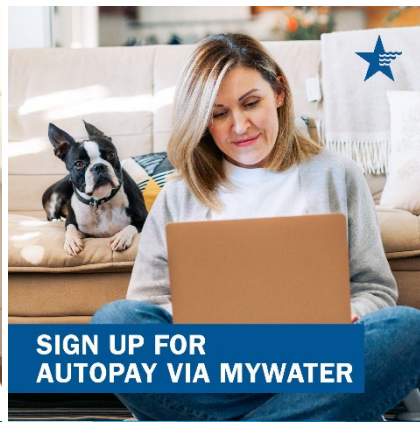
Enroll in Paperless Billing to receive your bill electronically! It's simple, secure and clutter-free. After enrollment, we'll send you an email with the amount due, the due date and a link to view your bill online (along with any materials that would have been included with your paper bill). Enroll today at [amwater.com/mywater](https://amwater.com/mywater).

**SUGGESTED COPY**

We love Paperless Billing! It's convenient, clutter-free, secure, and environmentally friendly! Enroll today at [amwater.com/mywater](https://amwater.com/mywater).

**SUGGESTED COPY**

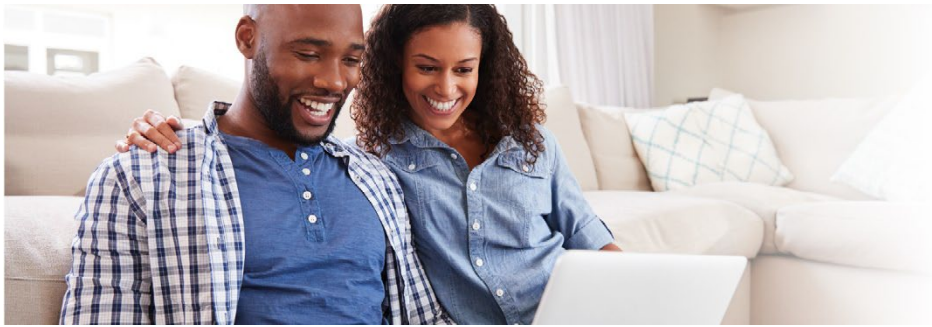
Join the other [insert number] of [State] American Water enrolled in Paperless Billing. It's simple, secure and eco-friendly! Enroll today at [amwater.com/mywater](https://amwater.com/mywater).



**SUGGESTED COPY**

Avoid late payments. Enroll in Auto Pay, and your bill will be paid on time, every time, on the date it is due. You can choose to have your monthly bill automatically applied to your credit card or deducted directly from your checking or savings account. No stamps required!





- Headline in blue box: ENROLL IN PAPERLESS BILLING
- Copy in smaller text under blue bar: It's convenient, clutter-free, secure and environmentally friendly!
- Enroll Today box -- Link to <https://login.amwater.com/>

This Valentine's Day...

# COMMIT TO Paperless Billing

Enroll today at  
[amwater.com/mywater](https://amwater.com/mywater).



AMERICAN WATER



WR-2024-0320  
MoPSC 0075 Attachment 1

# GO PAPERLESS

Receive, access and pay your bill electronically with **Paperless Billing** any time, anywhere. Plus, you can view up to 3 years of past bills. It's simple, secure and clutter-free! **Enroll today at [amwater.com/mywater](http://amwater.com/mywater).**



**Case No. WR-2024-0320**  
**Schedule CTT-d2**  
**Page 9 of 11**

WR-2024-0320  
MoPSC 0075 Attachment 1



TWO WAYS TO SIMPLIFY AND  
**GO PAPERLESS**

**RECEIVE** your bill electronically with **Paperless Billing**, It's simple, secure and clutter-free!

**PAY** your bill electronically with **Auto Pay** your monthly bill automatically on the due date.  
**No stamps required!**

**Enroll today at**  
[amwater.com/mywater](http://amwater.com/mywater).



WR-2024-0320  
MoPSC 0075 Attachment 1

# GO PAPERLESS

Receive, access and pay your bill electronically with **Paperless Billing** any time, anywhere. Plus, you can view up to 3 years of past bills. It's simple, secure and clutter-free! **Enroll today at [amwater.com/mywater](http://amwater.com/mywater).**



**Case No. WR-2024-0320**  
**Schedule CTT-d2**  
**Page 11 of 11**

**AA5. Reporting Date (-04:00 GMT) H3. Open End Combined State**

	Not able to submit payment scheduled for	
6/30/2024 12:04	7/3/24.	MO
6/29/2024 17:11	Old card expired	MO
6/27/2024 14:47	Error when enrolling in budget billing	MO
	I paid my bill in full payment was excepted	
	now making me paid another fee to	
6/26/2024 12:43	reconnect.	MO
	Was looking for disconnection	
	notifications. In today's world where the	
	mail is very unreliable, having these	
	notices available electronically would be	
6/26/2024 12:03	very helpful and beneficial for consumers.	MO
	Just wanted to enroll in Budget Billing but it	
	keeps giving me a stupid error even after	
6/25/2024 17:21	paying my bill weeks early...	MO
6/24/2024 15:58	[REDACTED]	MO
	Where is the break in my area that issued	
6/24/2024 8:11	the alert	MO
	Because my current bill is wrong. I made a	
	payment twice last month but my current	
6/22/2024 16:26	bill doesn't reflect my extra payment.	MO
	I was trying to find out more about budget	
	billing which was mentioned in your original	
	email but could not find a way to do it any	
	where. I am not behind on my bill but just	
	wanted to use budget like I do with electric	
6/20/2024 14:34	and gas bills	MO
	Couldn't put the CC payment	
6/19/2024 16:45	in..đŸ¤-đŸ¤-đŸ¤-	MO
	The website froze on me none of the tabs	
	worked for me and if I have to call	
	customer service one more time no body is	
6/19/2024 4:38	going to like me	MO
	I was trying to look up the actual bill and it	
6/12/2024 14:00	would not let me	MO
	Billing Information wouldn't go back further	
6/12/2024 2:53	than 36 months	MO
	All I want to do is change my email. No	
6/10/2024 12:07	place to do that on website.	MO

The bill is \$250 more than our regular bill. I am requesting a bill adjustment since we do not have a pool or sprinkler system and

6/10/2024 3:57 nothing has been running. MO

6/8/2024 13:13 No customer service contact information MO

6/6/2024 12:57 Need to update credit card MO

6/4/2024 16:33 Water smells so bad our pets don't drink it. Please correct. MO

6/4/2024 15:51 [REDACTED] MO

6/4/2024 13:11 [REDACTED] MO

6/3/2024 22:48 Only part of the page displays using iPad, and it doesn't scroll. MO

6/1/2024 20:19 Letter I received instructed me to schedule a service visit through MyWater. Could not find anything on website that would allow me to do this. Since I received the letter on Saturday, I will wait two days to call the office. MO

5/31/2024 10:58 Unresponsive MO

5/30/2024 14:05 The reconnect fee is \$188. Your service center is 200 yards from here. I'm living on social security and this is a crushing blow. As you can see I can't even pay all my bills. That fee is way over common decency. Can you give me a break? MO

5/30/2024 11:11 My water quality has been deteriorating since 3 weeks ago. It started smelling musty. Then it was musty and rusty. And now it's musty and the poor quality is giving skin rashes, pimples, plus unclean laundry. MO

5/25/2024 20:58 Payment was made on 5/24/24 at Walmart payment center have receipt with a reference number if needed MO

5/25/2024 18:53 It's none|No MO

5/25/2024 12:44 My autopay did not work, but I could not find out why. I went ahead and submitted an online payment today, but it was supposed to happen yesterday. Is there something else I need to do? MO

5/24/2024 17:10 Your calendar to schedule payment doesn't fit on the screen and there is no way to scroll over to some days on calendar. I'll have to find a computer with a wider screen so I can schedule payment. MO

5/23/2024 15:43 Cannot scroll down page MO

	Trying to pay credit card keeps asking for phone number. I enter it and nothing happens	MO
5/22/2024 12:09		
5/21/2024 13:39	I cannot complete a task	MO
	I was trying to use the download tab to download water usage data in either pdf or cvs format, but it failed on both formats.	MO
5/20/2024 21:30		
	Looking for a phone number to contact someone about my bill.	MO
5/20/2024 13:34		
	I had a water leak and have been getting the run around from American Water since the leak was repaired. Saying I don't qualify for an adjustment because the 12 month average was not great enough. I have 12+ months of bill on a water leak and since the leak was repaired my usage is &lt;1/3 of the previous bills. Please provide me some form of adjustment	MO
5/20/2024 12:50		
	Your website would not go beyond as k ing how I wanted to pay. I said credit card and that is where it all stopped. I tried again with electronic check and it at least tried to load but never did. I have been trying to pay my bill multiple times and now I have my first pink slip. I am very unhappy	MO
5/18/2024 20:31		
	No difficulty just want to know addresses which are affected by Mondays planned outage so I can let tenants know if needed	MO
5/17/2024 16:44		
5/17/2024 15:05	You	MO
	Flooded and destroyed most everything there.	MO
5/16/2024 1:52		
	Keep trying to make an appointment it says network error	MO
5/15/2024 19:53		
	Data not usually available until late morning the next day.	
	No meter readings. Data inaccurate such as 1st day of every 30-Day report is zero. Hourly data does not agree with daily data: one day they were about 200 Gallons different. I suspect data is being plugged to eventually agree with meter.	MO
5/15/2024 8:01		



I received a letter supposedly from Missouri American Water regarding back flow testing being scheduled. However, it did not arrive on MAW stationery and contains unusual statements. I would have liked to send you a copy by email to confirm if it is indeed a legitimate document, but the web site does not appear to offer an email option to engage customer service. If it does, can you please help me locate it? Thank you for this opportunity to share feedback. MO

5/13/2024 21:21

The website doesn't let me scroll and other functions seem off. I have tried different computers and its the same on each. MO

5/13/2024 15:26

No place to correspond with you except this survey. You owe me \$. Every time I turn water off to be away you cancel my service and in December you said you refunded me just before I had water turned on to be home at Christmas. I've never seen it. Today I saw an overdue bill which I paid way extra when you actually owe me. I wish you could just show a snowbird account suspended like everyone else does. This problem causes me a lot of grief. I am glad that I can pay my bill

5/10/2024 21:13 online. MO

5/10/2024 4:13 Website is crashing MO

Reason for low water pressure no

5/7/2024 9:28 answered MO

5/6/2024 19:52 Why can't I schedule a payment? MO

It's ridiculous trying to get customer service on the phone for American Water. You can almost never talk to a live representative. Furthermore not everyone has access to a smartphone or computer sometimes the questions we need answers to require an actual person to answer.

5/6/2024 14:40 |They suck MO

Keeps saying no logs and nothing is loading can't see Bill can't make payment

5/6/2024 4:35 can't see usage MO

I was in the process of setting up monthly automatic bill payment, but stopped that process when I saw the notation about incurring a \$1.95 processing fee. I was already unhappy about your removal of the waiver of the additional billing fee of nearly \$10/month (always the largest part of my low usage monthly cost) for low fixed income seniors, like myself, and I refuse to pay yet another fee to get you paid.

5/3/2024 13:50 Alerts won't open. Alerts aren't sending to my email or phone number at all. This website is useless MO

This is a crappy website  
Cannot change the password  
Cannot log out

5/2/2024 8:28 Pretty basic stuff  
Fire the people that created this price of shit and get someone that speaks english MO  
No live chat option. No way to request information other than by phone. No way to find out when water main construction will affect my property. No way to find out if I am scheduled for replacement of a lead service line.No way to communicate with you outside the narrow bounds you provide. You could do better. MO

4/30/2024 15:46 American Water needs to allow bills to be available through US Bank's Bill Pay service. I get tired of maintaining passwords and website logins for every single utility for multiple properties. MO

4/29/2024 1:54 Trying to schedule someone to come out due to high water bill I scheduled and it's not updating or loading the page to schedule. MO

4/28/2024 15:46 unable to scroll to see more of my account and if I want to go back I got a message that I would lose my page but than MO

4/28/2024 10:32 couldn't do anything not even log off. MO

the website won't allow me to anything but pay my bill. That would be understandable if I was delinquent but I am current and the bill is due on May 9th. I'd like to find out if it is safe to drink our tap water after a boil water advisory was issued for my area yesterday, and if not what the status is, and when we can expect to use our water again.

4/26/2024 10:32 MO  
Just says internal error contact administrator

4/26/2024 4:35 MO

American Water sent a crew to check my line for lead and I'm still getting emails to check it and American Water's website doesn't reflect the fact that they have been checked and there are lead pipes. When do the emails stop and the site is updated?

4/24/2024 15:42 MO

Since January I've had numerous conversations and correspondence with amwater, my account is locked and I've yet to receive information regarding an adjustment more in line with my usual bill of between 50 and 70 dollars

4/22/2024 7:06 MO  
It won't allow me to see anything on my account or to make a payment

4/22/2024 4:28 MO  
I cannot complete a payment. This has been an online issue for me for the last three months. I'm not late on paying my bill. I spoke with agent lady month, who told me to make certain that my Username was in all capitalized lettering. I did! Still

4/20/2024 12:51 MO  
no success.

It's been horrible. Login issues, slow loading pages, no buttons to select after choosing to pay by card. When choosing to pay by electronic check, it wouldn't load. After several day's attempt, still unable. I had to call in the payment for the prior two months. The agent told me to ensure that all the letters in my Username are all capitalized. I changed all of that and is still

4/20/2024 12:45 MO  
unable to complete a payment.

4/20/2024 10:21 MO  
CONFUSED ABOUT REPORTING LOWER PRESSURE THIS YEAR

4/19/2024 22:11 MO  
Auto pay was not working even though it said it was already set up.

4/19/2024 20:30 I help my mom with her bill pay and I have a hard time getting into her account to pay bills ! MO

4/19/2024 11:18 CUMBERSOME and DIFFICULT to NAVIGATE |NAVIGATION IS AWFUL MO

4/18/2024 23:34 Can't find the menu after I log in MO

4/18/2024 0:21 I could not complete my transaction for paying my bill online I don't know why it wouldn't let me pay my bill. MO

4/17/2024 21:10 Please Refund money \$279.42 MO

4/16/2024 14:33 I wanted to reactivate my irrigation account so I clicked on the button that said 'reactivate' and got a popup that told me to call 1-XXX-XXX-XXXX. There was no phone number, only Xs!!! So first of all, why can't I reactivate by clicking on reactivate and secondly, why isn't the phone number filled in? MO

4/16/2024 10:38 'wrong browser' type error issues. Trying to set up AutoPay with cc. The bank form is showing to fill out, but the cc fill form isn't showing up. Literally have to swap browsers to do this simple task. Maybe get your coders to write code for Firefox browsers too? MO

4/16/2024 8:54 [REDACTED] MO

4/13/2024 12:47 Pages too small. Does not have an option to chNge payment method MO

4/13/2024 1:47 My gosh. Have you not used this site yourselves? Nothing is clear (whether enrolled or not) and pages donâ€™t scroll properly. MO

4/11/2024 7:24 Leak adjustment documents cannot be uploaded. MO

4/10/2024 22:31 for the last 2 months no one has been in the house and there is water being used. prior to that 1 person was staying there on and off 6 months of last year doesn't make sincewater is going somewhere are something is very wrong. MO

4/10/2024 16:07 Why is my bill so high MO

4/10/2024 15:52 <https://mywaterv2.amwater.com/#/enhance> dportal is hanging... MO

4/8/2024 16:56 Stuck on the pay page, would not load the confirmation page MO

4/5/2024 17:14 Just wanted to see old statements for January, February & March. Regret paperless billing when I can't access them at all now! MO

I recently had my water reactivated. There was a pipe broken on my side of the meter. After I repaired it the fitting that connects to the meter on my side of flang. It's leaking.I didn't want to damaging the meter so I left alone and text you. MO  
4/5/2024 15:01  
Unable to find service outage info for my residence MO  
4/5/2024 13:16  
your site blocked me each time I tried to make my payment MO  
4/4/2024 15:54  
The site keeps freezing! MO  
4/2/2024 13:23

I just want to know why is my bill sooo high. We went from paying a water bill of roughly 70, with trash included. Now trash is seperate from water bill, and my bill is over 100.00. Why , come on make it make sense, please. This is highway robbery MO  
4/1/2024 18:07  
You are horrible for charging a fee to pay a bill. It's 2024!!!! MO  
4/1/2024 11:20  
Don't want my payment info saved, could not change it online MO  
3/29/2024 13:15  
Where is my payment arrangement at , I'm trying to pay it , It's 20 or 20 SUMTHN IDK , please help so I can get this payment out my pocket thank you MO  
3/27/2024 0:54  
3/25/2024 22:36 [REDACTED] MO  
Sat on hold for over 30 minutes, representative wasn't able to help me or answer my questions. Just told me I'd have to check online every day to see if my water was scheduled to be shut off and wasn't even sure if I could do that...awesome! MO  
3/25/2024 15:39  
3/25/2024 9:51 My situation was not addressed MO

The website kept throwing a "Internal error contact administrator" error over and over. MO  
3/22/2024 4:25  
But it did finally show my billing amount. High bill with low usage MO  
3/21/2024 8:53

Please make an obvious link to an email for non emergency issues.  
 While this is not an emergency it IS a huge inconvenience. I can't take a shower unless I want to stand in a dribble of water and try to wash, much less rinse.  
 This site doesn't give many contact reasons. It's just "set up service" "disconnect service" "change service" "set up payment" etc...  
 There are no alerts about water pressure issues in my area.  
 I feel this site is either for emergencies or payments. There are other reasons people need to contact you.

3/20/2024 23:25 MO  
 I wanted to find out my water usage for 2023 in order to complete my taxes. The filters were confusing. A simple piece of information made impossible.

3/16/2024 17:53 MO  
 3/14/2024 15:35 MO  
 Can't seem to download billing summary even though there is a download icon. I want to know bills over the past 3 years but it looks like i have to download each statement separately

3/13/2024 22:56 MO  
 Website won't allow for patron to enter payment information

3/13/2024 15:58 MO  
 3/12/2024 11:27 MO  
 Need current bill

Even though I got an email stating that our bill was ready for review, I was unable to review or print it. The only bill is the previous bill and I have been trying to print it since 3/8/24. Even the other account's new bill is doing the same thing.

3/12/2024 8:02 MO  
 3/11/2024 16:40 MO  
 Cannot make payments.  
 I have paperless billing. I received notice that my current bill is available. The "current bill" is NOT current. It's been paid. I'd like to see my actual current bill but of course I can't do that. And the billing and payment history of my account is impossible to make sense of. This website is NOT helpful mainly because there's no email address to send questions and the phone number isn't any help on weekends. This the worse utility website I've ever come across.

3/11/2024 16:37 MO

3/11/2024 12:35	<p>Data displayed is not current. Web site does not update to current billing information. Is this anyway to run a Utility??</p>	MO
3/9/2024 10:59	<p>Information on past gallons used by month or year not provided. Also, the screen for Usage would not allow me to scroll to the top. It would be locked at the bottom of the screen.</p>	MO
3/9/2024 3:58	<p>I want to print the March 2024 bill. There is only "payment" option, which I don't use. Please tell me how to print the bill. Thank you.</p>	MO
3/8/2024 14:04	<p>I am unable to scroll down the screen, have to navigate to "My Accounts" in order to find "Make Payment". This has been going on since I made the online account.</p>	MO
3/8/2024 7:53	<p>The asinine requirement to use a certain browser. I'm not going to install a browser to for just one website. You need to reprogram your site to have the maximum compatibility across all browsers. I use Linux computers at home and I have used Mozilla Firefox type browsers since the early 90's.</p>	MO
3/8/2024 7:42	<p>I find it asinine that your site does not support Firefox, one of the MAJOR browsers used. I'm not going to use/install a different browser just to visit your site. I use Linux computers at home and I have used Mozilla Firefox since it was NCSA Mosaic back in the early 90's. Your programmers need to reprogram the site to have the maximum compatibility for all browsers. In websites there is such a thing as too pretty. When it comes to a billing site, function is better than appearance.</p>	MO
3/7/2024 21:01	<p>This account is tied to a house I did not purchase. I have asked several times to link it to my current home. Every time I log in it takes me back to the address I did not live at. It's inconvenient for me trying to pay my bill.</p>	MO
3/7/2024 13:20	<p>view my bill</p>	MO

When I pull up my bill for this month it only brings up the previous bill. On the website it shows my current balance but not able to bring up the statement. MO  
3/7/2024 10:45  
3/7/2024 9:42 Bill not available to view/print MO  
some account are not on the portal and I'm  
3/6/2024 10:05 not able to add the accounts MO  
3/5/2024 11:16 [REDACTED] MO  
I am trying to report 4 guys have come to my property to start the water service and install the meter. After 4 weeks I STILL DONT HAVE WATER SERVICE IN MY  
3/5/2024 10:42 HOUSE!!! MO  
3/5/2024 7:39 Invoices never generated on time MO  
Am unable to move past the screen that says pay with checking account. Shows No Service History in Account. Site seems  
3/4/2024 16:26 to be having issues. MO  
My Bill information was not accurate with  
3/3/2024 17:57 other information on the web page. MO  
Have not received February invoice for  
3/3/2024 13:29 service. MO  
Web Site will not display current "My Bill" data. It is frozen on the Jan 2024 billing data, showing "Due Date: Feb 23, 2024". "View Current Bill" show the actual current hard copy bill with actual amount due. Site does not display the updated, current  
3/3/2024 12:45 amount due. What Gives??? MO  
I don't see an option to report my issue I'm having my water pressure is the issue and I don't see an option  
2/29/2024 20:16 besides calling a rep. MO  
2/28/2024 16:31 See previous input page description MO  
Website would not "submit" for lead  
2/28/2024 7:17 on your service line at our address. MO

The option to select credit card or electronic check do not work. THE options only allow autopay enrollment, or cash payment locations.  
Autopay is not good for me since pay days move during the month and ensuring funds remain consistent is an issue. MO  
2/26/2024 23:09  
2/26/2024 19:43 [REDACTED] MO  
2/26/2024 7:52 kept spinning never opened MO



water usage option of DAILY USAGE has been removed from customer page!!! All that is left are 2-3 options incl. monthly and yearly. DAILY was available in the last few days, because I was checking it to verify I had corrected the leak excessive usage so I could verify issue resolved to get a one time adjustment. I can no longer see that detail on my dashboard. SO NOW I MUST WASTE THE TIME OF A SERVICE PERSON TO COME OUT TO VERIFY THE lower usage.

2/25/2024 23:14 After i click to pay, no matter which to pay, it tells me i have timed out. This is the 2nd day in a row I have tried to pay and cannot get past that point. Now my payment will be late. MO

2/23/2024 16:45 Circling and grayed out page MO

2/22/2024 15:25 Poor service MO

2/22/2024 9:06 Don't understand my balance and why \$311 was auto payed. Tried to call and left message for a call back, but never received a call MO

2/21/2024 6:35 Repeatedly would not let me sign in.. MO

2/20/2024 17:41 If the site wouldn't glitch out and make me redo everything I did 5 times that'd be great. MO

2/20/2024 17:41 Reported on 2-17 approx. 1:30 pm having no water do to the fact, the water company leaving pipes expose to the air at below freezing temperatures. Including a 4 foot hole in my yard. It is now 2-16 in the evening 6:25 pm, and still no water are knowing the timing on when I will have water restored. MO

2/18/2024 19:28 Had an appointment set up today for a meter exchange and no one showed up. I have waited at home all day. Appointment was supposed to be Sat. FEB 17th 7 to 4. MO

2/17/2024 17:37 We had made a change to turn the water on at a new address and it is still not on. MO

2/15/2024 21:05 your data is 48 hours behind real time MO

2/15/2024 10:20

I am on a fixed income and I get paid on the first of each month and I would like to pay my bill at the water company after the first of each month but your bill is are not always after the first of the month. Why donâ€™t you have your billing come out

2/14/2024 22:50 on the first of the month or later MO  
 2/14/2024 22:35 Nothing MO

I contacted customer service on Friday, February 9, 2024 regarding un-syncing one of the accounts under this profile. They said give it 24 hours to complete. I checked on Monday, February 12th and it was completed. I called back in on Tuesday, Feb. 13th, to hold over 20 minutes just for them to say that I need to wait again. I am not sure why it's so hard to change this account over from one profile and create a new one so the business managing this commercial property can properly pay the bill with easy navigation on your site rather than logging in under another company's profile. There has to be an easier way to provide this service without having me spend so much time on hold just to not have this issue

2/13/2024 13:56 resolved for two days now. MO  
 Trying to schedule a meter change per the letter re-received. There is nowhere on the app that allows you to do that even though the letter tells you to go to the app

2/12/2024 22:24 complete waste of time horrible app MO  
 data you are providing has not caught up in time to an activity that I did to fix a leak. Get back to this tomorrow, but I took action Saturday and not showing up yet Monday

2/12/2024 21:18 night MO

I received verification that my bill was paid. There was no verification of the account number, no verification of the amount nor the date paid. I know there are kinks to be worked out in the beginning of this process. But why make it so hard to make a payment. Too many hoops to jump through. And why on earth is the water bill so high. This bill is double the amount of our bills before the buy out, and the trash was added on to the bill. W this is outrageous, especially paying this much for water yhats undrinkable. I still buy bittled water to drink. Make it easy for the people of this community to pay our bill. Give us accessibility to a place we can go to, to pay our bill, please. MO

2/12/2024 10:33 Iâ€™m trying to schedule a time for required access for meter exchangeâ€”but work during the business hours that the phone line is open. Unable to schedule an appointment to have this done MO

2/11/2024 23:19 Good experience MO

2/11/2024 13:23 Half the page was off mobile screen and without any kind of slider I couldn't see what was there. I first tried on Windows PC but the payment entry field was grey and blank. MO

2/10/2024 9:00 Iâ€™m trying to pay the remaining balance of my February bill. That total is \$34.51. When I hit make a payment it comes vaccine itâ€™s declined which I know for affect the business not true because I just MO

2/10/2024 3:01 Your website is awful and consistently locks up when going between different pages. It is not updated and has incorrect information in multiple places making it impossible to manage our account. I am unable to track water usage because it rarely has up-to-date or accurate tracking info. It is inconsistent at providing actual meter readings and has so many issues there are too many to list. Look at the way Arkansas Water Department manages their website and has an app that is very user friendly. MO

2/9/2024 16:21

2/9/2024 8:00	Billing page wouldn't load. 404 error notices	MO
2/9/2024 7:32	Wheni click on pay my bill, it will not go past the loading stage.	MO
2/9/2024 6:19	No bill or balance provided, no information loaded to page, no option to see or pay bill	MO
2/9/2024 6:17	Trying to pay my bill and the sites not responsive	MO
2/8/2024 18:17	I was trying to figure out why/how my water usage has increased. I have not been using more than normal water but since October it shows I am using a lot more than I had in previous months and I can't figure out why. I live alone, do 4 loads of laundry a month, run dishwasher every 4 or 5 days when it is full and shower 3 times a week sometimes 4. I can't find any leaks and yet your graph shows I am using more?? I understand the increase this month I just don't get the water usage.	MO
2/8/2024 11:46	Website fails to show details of refund issued	MO
2/7/2024 18:29	Na	MO
2/6/2024 20:28	Your people are working on our street and our facet will not stop dripping	MO
2/6/2024 13:05	The crew never showed up. It was requested to be in the morning 830 9 oâ€™clock so that the plumber could follow I had to put him the plumber on hold down the road.	MO
2/6/2024 10:18	I have several accounts but canâ€™t ad them	MO
2/5/2024 11:47	Ok	MO
2/5/2024 2:14	I'm trying to log in it won't let me	MO
2/4/2024 17:11	I had a break under my house of water lines. Subzero temperatures caused everything to freeze up. Getting a plumber took a few days and quite a large service bill.I have been in contact with mo am water by phone and was told I would receive an adjustment	MO
2/4/2024 5:19	Need to talk to a person this doesnâ€™t make sense at all	MO
2/3/2024 21:04	After selecting the payment option, nothing else appeared to complete the transaction	MO

	As a landlord, I have multiple Water accounts, but only a few of them show up	
2/2/2024 23:00	here makes it hard to work with wrong information on you website. showing a current bill amount that was read on 1/25/24. I do not have an account at that location. i have not had an account at that location since 2/2023. Bill show paid and zero balance. Current bill shows	MO
2/1/2024 9:30	9.40 is due. Bad Info. My bill was \$51.03 last month and this month itâ€™s 132.71.	MO
1/31/2024 17:58	I have no leaks anywhere inside or outside faucets	MO
1/31/2024 13:19	no where to call and have service to determine why i have such a high water usage. they came out but did completely help the situation	MO
1/30/2024 8:44	Needing to use Chrome was suppose to be easier but wasn't.	MO
1/29/2024 16:33	[REDACTED]	MO
1/29/2024 10:35	I still don't understand why my autopay did not pay the bill this month.	MO
1/29/2024 10:05	we have multiple accounts and i cannot add an account so i can retrieve a copy of a bill	MO
1/28/2024 4:07	[REDACTED]	MO
1/27/2024 11:29	There is nowhere to request a service visit in response to a notification sent to me regarding a possible leak. I was told my meter has been running for the past 7 days and thus there may be a leak. After being unable to find the leak I was told on the notification to put in a service request. There is nowhere to do that on the website as it's not an "emergency" and I'm not starting or stopping service or have water quality concerns.	MO
1/27/2024 8:35	Pop up? ( Is my email new.) Frozen, so than no access to m	MO
1/26/2024 20:08	[REDACTED]	MO
1/26/2024 18:29	American water suck	MO
1/26/2024 7:42	The 24 hour usage is not showing up on web page	MO
1/25/2024 18:03	I cannot change auto pay online.	MO
1/25/2024 15:51	Why weren't we notified of a water main break in our neighborhood? If there was an issue of the quality of water or if we needed to run our water.	MO

There's a major glitch in the system. The payment option when tapping it wouldn't allow my task to be completed. MO

1/25/2024 3:55 I cannot add an individual account to my login ID so that I am able to view the billing statements and make payments. I have contacted AM Water about this situation at least 2 times already aside from this one. There has got to be a simpler way to add an individual account online through the CONSUMERS side of the website not the representatives as most of them do not add the individual account to the login ID. Sometimes representatives add the account for you but most times they don't and they leave you to do it but when I called about this situation last time the representative didn't even understand what an individual account was or how to add it to my login ID. I don't believe it is right to have an accumulating balance on an account when I can not view or make a payment on said account because I can not link it. As for the paper bill being sent through mail I don't receive the bill (in paper form) until after the due date and late fees are already charged, forcing me to take extra steps to resolve the wrongful charges on a account. Not sure if it is on the mail carriers side as to why I don't receive the paper bill on time or AM Waters side for We need alerts via email as we manage several commercial accounts and did not receive alerts regarding a water main break in the area. MO

1/24/2024 19:22 I have a total of six accounts only four of them appear online. I tried to call to see about getting all six of them online so I can pay online but they do not know how to do this.???? so I must continue to pay the other two at my local grocery store. This is kind of embarrassing.?! MO

1/22/2024 15:09 How to report a water main break. no history on billing, no way to verify overpayment MO

1/22/2024 14:56 The current bill was not available, although it reported to be available. MO

1/21/2024 19:47

1/20/2024 18:26

1/20/2024 16:28

Unable to access and update correct contact info. American Water has emailed the same bill twice. Also additional funds were withdrawn from my banking account. I have called

1/18/2024 20:32 unfortunately no results.. MO

1/17/2024 15:01 wanted to pay bill - I'm being charged - just adding to me adding to me not owing. MO

1/16/2024 23:15 They didn't take payment when I paid and other bills were taking out which cause a major issue MO

1/16/2024 0:29 Unavailable to get past Gmail confirmation No one to talk too. Where my water meter is It is full of water and ice all along MO

1/14/2024 15:21 road MO

The billing and payment history doesn't add up at all. The last bill I had shows a balance due of \$35.48, I cannot find a record of a payment I made and somehow in the online dashboard it shows I have a credit of -\$2.57. It's super confusing and somehow I feel like I'm going to end up with a past due balance, even though it

1/11/2024 8:41 shows a credit. MO

1/10/2024 21:15 Need an agent MO

1/10/2024 21:14 Bill wasn't available MO

Mo Am has a convoluted setup for water service at this address that can't be addressed through the website or even

1/10/2024 11:20 with a call to customer service. MO

best webpay site of for major utilities in St.

1/5/2024 19:39 Louis. beautiful and stress/free! MO

I'm trying to make a payment and it's

1/5/2024 13:05 declined each time. MO

The time line for when I always receive and pay my bill is overdue but my account keeps saying I have a \$0.00 balance due. I am trying to make sure I didn't do

1/5/2024 10:39 something to cause a problem. MO

the system will not allow me to complete

1/5/2024 6:29 the application MO

I am attempting to find my December bill and it is not in the system. I do not want to be late or have other issue since my last 3 bills were estimates. We did have

1/4/2024 21:26 somebody check the meter in November. MO

1/4/2024 9:17 Questions MO

	I enter in my payment information and site will not fill in the information.	
1/3/2024 10:33		MO
12/31/2023 8:47	Can't enter new card	MO
12/26/2023 14:07	Billing page a mess.	MO
12/21/2023 14:23	Chat was not helpful for any billing issues and I can't talk to a person	MO
12/21/2023 13:07	Your website does not allow me to turn the water off as I have now tried to do no less than 10 times. Really poor service.	MO
12/19/2023 12:24	Site crashes. Unable to get downloads of previous bills. Unable to get details of water usage. Site kicks me out continuously.	MO
12/19/2023 8:01	Invoices are never available on due date. (12/15/23) today is 12/19/23 still not available	MO
12/19/2023 5:28	Will not go to the next page to submit my request	MO
12/18/2023 21:09	Would like to see my water usage per day and the graphics are not very good.	MO
	Needed to contact via web site. Interminable hold on customer service line. I was told I had a service appointment this morning then found out it was never set up. Misinformation abounds! Today I hope I received accurate info and do indeed have an appointment for January 9.	
12/18/2023 12:45	I'm losing confidence in you.	MO
12/17/2023 22:42	The pay my bill via credit card shows my card. I select the card. But there is no other button to direct the page elsewhere. It doesn't ask for cvv. It's like the bottom half of the display box for selecting payment is missing everytime I load.	MO



I called in the other day and spoke to a CSR, I asked for a Payment Arrangement, he told me I would have to pay \$92.00 to make an arrangement, I didn't have it. He said I am scheduled for Disconnect on December 19, I told him I did not receive the Notice, I am looking for the Disconnect Notice here online and I don't see it. I'm being asked to take the Survey before I can look for the Notice. I'm a Senior Citizen that had a decrease in income recently and I had to spend a lot of money to move 2 months ago, so I really need an arrangement. I previously

12/16/2023 19:25 submitted a Doctors letter. MO

12/15/2023 18:37 My water is off in my house MO  
I have been trying to pay my bill for a week but the site will not load after it was down for maintenance

12/15/2023 0:26 MO  
I had no idea how to combine my accounts. I spoke to a wonderful rep Brit who helped me. I spoke to a rep, Chloe who was nice but didn't understand so did it wrong. MO

12/14/2023 15:18 Got email asking me to sign in and update my info then after doing that asked me why I signed in.( you asked me to) MO

12/14/2023 9:47 I am not able to add an account to the portal I am getting an error message. MO  
The website NEVER loads the full page. I have never been able to complete a

12/12/2023 13:19 payment through the site. MO  
Can't pay bill because screen won't stop

12/11/2023 22:25 loading MO  
Website doesn't allow to save alert

12/11/2023 20:41 notifications MO

12/11/2023 20:21 No way to set up alerts MO  
Website will not allow me to enroll in autopay, thus creating past due payments

12/7/2023 21:23 that I have to pay. MO

12/7/2023 12:19 Waiting for answer from customer service. MO

12/6/2023 15:40 Service schedule was not working MO

Changed 6 accounts to paperless billing,  
1/2 did not change the 1st time, had to go  
in and change again. When deleting an  
email address it moved to another line so I  
12/6/2023 12:30 had to go in and delete it from that line. MO  
When I go online my accounts show a  
\$0.00 balance but I decided to click on  
view my bill and when I did it shows I am  
pass due. So, now I need to wait until 8:00  
am and speak to a person as I am  
12/5/2023 7:55 confused of which one is correct. MO  
Inncredibly improved website!!!  
12/4/2023 19:23 Congratulations! MO  
I can't find help for why we suddenly have  
a water pressure problem, and our last  
12/1/2023 16:59 month water usage was so much higher. MO  
Can't pay the correct amount  
  
12/1/2023 14:00 MO  
Still low water pressure. No alert posted for  
12/1/2023 12:11 my street. MO  
Payments selection only spins, and doesn't  
12/1/2023 10:43 complete MO  
11/30/2023 14:19 Bill not ready yet MO  
I wanted to change my autopay method  
which it seems to have done but there is  
11/30/2023 10:24 no option to remove the previous method. MO  
11/29/2023 23:40 Stop raising my bill MO  
11/29/2023 8:51 the page froze MO  
I did not authorize for anyone else to be on  
my account. And I'm trying to find out who  
11/28/2023 21:50 is trying to get into my account. MO  
11/27/2023 16:13 It would not let me continue MO  
I don't understand how my bill could  
11/26/2023 15:30 be this high. MO  
11/24/2023 12:48 Web site functionally MO  
Site locks up, just stops with no reason  
given when trying to set up autopay.  
Selected pay with credit card and site did  
11/23/2023 2:13 proceed to ask for card info. MO  
Since they put in new piping going to the  
grade school the bill has been \$20 higher  
11/20/2023 12:31 each month MO

Everytime I go to pay my bill through the website I have to constantly flip my phone in circles to reach a corner of the button to pay the actual bill.. this is ridiculous I always have to do it 3or.4times.. don't let me get discouraged and click off to have to come back and repeat those steps .. I just started with American water so I feel bad for the long term costumers or the seniors

11/19/2023 22:51 smh please fix ugh MO

yes, settings not showoing proper options for email removal. emails keep going to an old address and cannot unsubscribe.

11/18/2023 12:00 MO

I was told we had an order in for you guys to turn on my moms water from 8-9. It ain't on amd now no answer until monday i paid for it to be turned om today its bullshit

11/17/2023 22:06 MO

Could not find if I am enrolled in AutoPay & if my December bill is set up for AutoPay. Couldn't find out how to imput my banking information

11/17/2023 15:39 MO

11/17/2023 11:24 MO

Keeps popping up with a no log statement and when I try to make the payment it just freezes or goes slow. I've tried 3 different web browsers.

11/17/2023 3:34 MO

I paid the \$55 fee once and itâ€™s still showing owing \$55 and when I tried to pay it again . It says tits paid do I want to pay it again

11/16/2023 8:37 MO

11/14/2023 19:03 I was on hold for over an hour. MO

11/12/2023 11:13 Why won't you accept a partial payment MO

I have been trying for over a month to make a payment. Your website will not allow me to pay you. I tell it credit card and

11/11/2023 20:37 it just sits there. MO

When using a tablet (iPad Mini), I had to close and then reopen the Make a Payment section to enable adding a debit card. Initially only a half-panel opened which did not make adding the card visible.

11/11/2023 11:24 MO

I am not able to delete a phone number that is not suppose to be on my account

11/11/2023 0:48 any longer MO

11/9/2023 14:00 I want to add another account to Auto pay MO

I am paid in full and yet my online account page shows that I have a remaining balance and for the 2nd month in a row I have not received my monthly bill. Last month I received 2 bills within a 7 day period. I just don't understand how a large company as yourself cannot get this

11/8/2023 6:01 "glitch" fixed. MO

I was unable to add an account for the company due to not knowing what the representative put for the first and name last of the company on the bill. When adding an account you need to put first and last name as it appears on the bill. I am unable to do that unless I see a statement and I cannot view a billing statement due to not being able to link account because I don't know how the representatives place the company's name in the first and last name slots. Waiting for the billing statement in the mail seems like my only option here but due to mailing issues some statements are received after due dates and a late appears out of my control. If there could be an easier way to add an account or link an account to main login info (Username & Password) I'm sure I wouldn't be the only one who would very much appreciate it. Thank you and have a

11/6/2023 17:08 great day! MO

I am not able to link my new account or

11/6/2023 15:00 edit my profile. MO

Looking for a date American Missouri

11/6/2023 8:20 chesterfield mo MO

11/2/2023 3:18 [REDACTED] MO

I was trying to pick the country and United

11/1/2023 22:43 States or North America is listed MO

there is multiple account information for

11/1/2023 20:23 multiple addresses and multiple utilities MO

and multiple choices that don't pertain to a

water bill. wtf

Wasn't able to give me a clear and honest

11/1/2023 10:15 reason why my bill was \$219.00 one MO

month and less than \$50.00 followings

month with no changes.

STILL HAVE NO WATER!!!!!!!!!!!!!! WE'VE BEEN UNDER A SERVICE REPAIR FOR THE AREA SINCE OCTOBER 26TH WITH NO WATER. TODAY IS OCT 31ST. IVE CALLED MULTIPLE TIMES AND YA'LL JUST DONT CARE. ALL YOU DO IS SAY ITS STILL AN ACTIVE WORK ORDER. WELL FOR HOW LONG??????

10/31/2023 18:30	THIS IS AN APARTMENT COMPLEX. I want to see the log that shows when I used thousands of gallons of water. No one will help me . PLEASE HELP ME!	MO
10/31/2023 17:32	Wanted a warm body to talk to not a link to your web site	MO
10/31/2023 10:08	Keep getting error when putting in my card information to pay my bill	MO
10/31/2023 3:14		MO
10/25/2023 20:29	Want you to know I am moving on 11/5/23. No other business has asked me for supporting documents to change my name.	MO
10/25/2023 3:00		MO

Some kind of new programming in the system was changed in the last couple of months. We are a real estate investment company with several separate entities with water bills to pay with a variety of bank accounts. Where in the past year/s, I've went into one company's username/password, paid the bill/s, logged out, and then logged into another company's username/password, and did the same for each. Logging out of one and into another within moments, paying numerous bills in a short timeframe. Now, the first time I enter the website I am given the choice of all our entities to login to, I choose one, pay the bill/s, and logout; upon wanting to go into another entity, I am no longer given a choice of our entities, but automatically logged back into the same entity I was just in. I'm unable to access another entity until I've shutdown/re-started my computer or it's another day I'm working and I can again choose which entity I want to login to. I reported this a month ago and was just assisted in paying all of the entities' bills by phone. Now a month later, same thing is happening; I do not want to pay them all by phone again.

10/24/2023 18:29	This takes far too much time on both my And won't let me pay my bill just keep	MO
10/24/2023 4:41	loading	MO
10/23/2023 22:28	User friendly	MO
10/23/2023 16:56	For three days the site has been unresponsive. Iâ€™d tried to pay bill, or set up auto pay and could not do it.	MO
10/23/2023 9:49	There's no option to notify you that a property has been sold and the water account should be closed out.	MO
10/23/2023 4:37	I have been trying to pay my bill all weekend. There has been website issues everytime.	MO
10/21/2023 18:47	I had issues when trying to report a leak for a bill adjustment	MO
10/21/2023 14:19	I need to cancel service appt on the 26th of Oct, 2023. Need to reschedule meter replacement.	MO
10/20/2023 20:48	Out of town til Feb 2024 We have no water. I paid the bill	MO

10/20/2023 20:41	No way to submit payment after choosing payment type	MO
10/19/2023 23:12	Unable to enroll in budget billing	MO
10/19/2023 9:04	None of the invoices for our account are generating so I can print them out. If I can not see or print the bill, I can't pay the bill.	MO
10/18/2023 16:45	Was not able to download bill	MO
10/18/2023 7:42	I am applying to CAASTL to see if they can assist in helping me with my bill. CAASTL	MO
10/16/2023 15:38	No option to complain about high bill	MO
10/15/2023 19:06	Made payment viewed receipt stating paid. I get a message to pay my bill	MO
10/15/2023 8:50	You have a button for changing Auto-pay to a credit/debit card. When I click on it, it tells me I can switch to a card after I enroll an account for electronic debit. I already have an account enrolled for automatic debit but it won't let me proceed. There is link to the next step.	MO
10/13/2023 23:48	I was charged twice	MO
10/13/2023 12:28	The option to unenroll in autopay is not working and I need to unenroll. I tried on two different browsers on both my computer and my phone. Please advise.	MO
10/11/2023 15:34	I received a high water bill. During the billing cycle, I was watering twice a day for two weeks due to reseeding and compost on my yard. I wanted to see a daily water usage and to see if it went back to normal after the watering. I contacted customer service and the guy was nice; however, he said there was no way to obtain that information. He said to wait until your next bill to see if it is normal or high. That does NOT help the situation if there is a huge water leak somewhere. I am trying to be proactive, but American Water cannot help me the customer with seeing my current water usage. I would think that would be a huge help for all of your customers.	MO
10/10/2023 17:29	I want to know why it was disconnected without a notice. I just received a bill with a due date. I did have a partial balance passed due from the previous month but I was set to pay it off before the new due date.	MO

10/10/2023 17:03	I have 2 accounts with you, but I can only see one online.	MO
10/10/2023 10:01	We called 3 times still we are seeing status as Inactive.	MO
10/10/2023 4:40	Entered all info Twice . Next button never did complete transaction. Went nowhere no current bill on file, no way to make a payment.	MO
10/9/2023 11:45	There is no note about the results on the investigation of the metering issue, it would be nice having the information about what the technician found.	MO
10/5/2023 14:20	I could not pay online. My current bill (Service Period August 8 to September11) was not available. Last accurate listing was 6/23 payment for a service Period 4/12 to 5/9.	MO
10/4/2023 23:07	Dr SJT	MO
10/4/2023 20:40	I have Autopay set up with a credit card. I am seeing a past due amount. WHY!!!	MO
10/4/2023 17:16	I tried to change my email address but your website would not make the change. I spend almost 30 minutes trying.	MO
10/4/2023 14:38	Place a telephone number in a PROMINENT place on the website. I am unable to deactivate service. Human beings available for service/help.	MO
10/1/2023 14:56	I was trying to inform you that a payment of 172.48 was mailed on the 26th and try to find out what I needed to do to keep my water from being shut off. However, your website doesn't help people when your customer service staff is not in during non business hours. My wife, whose father had Alzheimer's, is beginning to forget things, so several bills have gone unpaid. I'm trying to handle this, however, I work in construction and am not able to do it during normal business hours.	MO



**DATA INFORMATION REQUEST**  
**Missouri-American Water Company**  
**WR-2024-0320**  
**General Rate Case**

**Requested From:** Ashley M. Randell

**Date Requested:** 07/12/2024

**Information Requested:**

According to page 48 of Jody Carlson’s direct testimony, only customers who have –both a valid email address on file and an active MyWater account will receive an email informing them they will be enrolled in paperless billing unless they take action. Email delivery and opening will be verified electronically. “A second email and a subsequent mailed postcard will also be sent to all such customers to remind them that they will be enrolled in paperless billing.” 1) How does the Company intend to electronically verify that the first email is delivered and read? 2) After receiving the first email, how long does a customer have to open it until they are no longer considered eligible for auto-enrollment into paperless billing? 3) Does the Company intend to send the second email and mailed postcard to all customers who were eligible to receive the first email (those possessing a valid email and active MyWater account), or only to all customers who received and opened the first email as verified by the Company? 4) Does the Company intend to electronically or otherwise verify the delivery and opening of the second email or mailed postcard?

**Requested By:** Tyrone Thomason ([Tyrone.Thomason@psc.mo.gov](mailto:Tyrone.Thomason@psc.mo.gov))

**Information Provided:**

Jody Carlson’s testimony will be updated on pages 47 and 48 to reflect that in the email campaign for paperless billing, the Company only receives verification that the email was delivered, not opened.

1. Emails are considered delivered if the Company does not receive a notification that the email bounced after delivery. The Company does not intend to verify if the email was read by the customer.
2. As long as the email does not bounce, the customer will be enrolled in paperless billing unless they opt-out by contacting the Company.
3. The Company intends to send the post card and second email to all eligible customers with the exceptions of customers whose email bounced in the first batch, any customers who have opted out of paperless billing and any customer that unsubscribed from the mailing list.
4. The Company intends to electronically verify the delivery of the email, the Company does not intend to verify the mailed postcard.

**Responsible Witness:** Jody L. Carlson, P.E.